

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	3:11CR337
)	OCTOBER 16 & 17, 2013
vs)	
)	
CORVAIN T. COOPER, AKA "CV",)	
NATALIA CHRISTINA WADE,)	
EVELYN CHANTELL LaCHAPELLE,)	
)	
Defendants.)	
	/	

TRANSCRIPT OF THE DIRECT TESTIMONY OF
GLENN MACDONALD, LEAMON MOSELEY, DARRICK JOHNSON,
DANIEL CROCKETT, SHONDU LYNCH, SHARON KELSEY-BROWN,
EVELYN LaCHAPELLE

BEFORE THE HONORABLE ROBERT J. CONRAD, JR.
UNITED STATES DISTRICT JUDGE

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P R O C E E D I N G S

OCTOBER 16, 2013

(Excerpt from proceedings.)

MR. KAUFMAN: We will recall Agent MacDonald to the stand.

GLENN MACDONALD

having been previously duly sworn, resumed the stand and was examined and testified as follows:

DIRECT EXAMINATION CONTINUED

BY MR. KAUFMAN:

Q Agent MacDonald, when we broke last night I believe that we just discussed what's on the screen now, Exhibit 38C, Ms. Wade's list of deposits into her account on the left-hand side and withdrawals on the right.

Did you create -- and you had also testified about separate, more detailed spreadsheets in 38A and B for the withdrawals and then the deposits. Have you created similar exports of data from the certified records for the other defendants as well as for other targets in the investigation?

A Yes.

Q I'd like to turn your attention to what's been marked as 37A for identification. Do you recognize what this is?

A Yes.

Q I'm going to page 2. What is this?

A That's a spreadsheet showing deposits into Evelyn

1 LaChapelle's account.

2 Q What's kind of deposits?

3 A Cash deposits.

4 Q So similar to your testimony yesterday, you only included
5 cash deposits and not any other types of deposit activity?

6 A Yes. Cash deposits and what appear to be cash deposits.

7 MR. KAUFMAN: Your Honor, we'd move to admit 37A and
8 publish to the jury.

9 MR. LEE: No my objection.

10 THE COURT: Let it be admitted.

11 (Government's Exhibit No. 37A received.)

12 Q And with regard to the time period that you obtained
13 records, what time period does that cover?

14 A Well, it's from -- this particular data, it was
15 February 2009 through September 28th, 2009.

16 MR. LEE: I'm having a hard time hearing.

17 THE WITNESS: I'll speak up. Sorry about that.
18 Does this amplify anything, this mike?

19 BY MR. KAUFMAN:

20 Q And in total in that approximately eight-month period,
21 how much in total deposits were made into her accounts?

22 A I'd have to see the full screen again, please.

23 678 -- let me repeat that. \$678,230.

24 Q Next I'd like to show you what's been marked as 37B, page
25 1 and page 2. Do you recognize what this is?

1 A Yes, I do.

2 Q What is?

3 A That's a spreadsheet showing withdrawals, cash
4 withdrawals from Ms. Evelyn LaChapelle's accounts.

5 MR. KAUFMAN: Your Honor, move to admit and publish.

6 MR. LEE: No objection.

7 THE COURT: Let be admitted and published.

8 (Government's Exhibit No. 37B received.)

9 BY MR. KAUFMAN:

10 Q And when I asked you about the time period covered by
11 that spreadsheet, you hesitated for moment. Can you explain
12 why that was?

13 A Well, I wanted to view what dates were on there. I've
14 gone through a lot of documents. The most accurate way for me
15 to tell is to look at the documents that are on the screen.

16 I had mentioned that the last ones covered February of
17 2009. This one, the first entry is January 29, 2009.

18 Q And the final cash transaction that you identified
19 through the records?

20 A \$701,320.

21 Q And the final withdrawal from 37B is?

22 A Is 928, 2009.

23 Q Now, next I said like to show you what's been marked as
24 37C. Do you recognize what this is?

25 A Yes.

1 Q What is it?

2 A That's a side-by-side comparison. That's taken the
3 information from the previous two spreadsheets and putting
4 them side by side corresponding to the dates and the
5 transactions.

6 Q Did we refer to that as in-and-out transactions
7 yesterday?

8 A Yes, we did.

9 MR. KAUFMAN: Your Honor, we move to admit and
10 published 37C.

11 MR. LEE: No objection.

12 THE COURT: Let it be admitted and published.

13 (Government's Exhibit No. 37C received.)

14 Q And did -- in these accounts also for Ms. LaChapelle see
15 a -- any trends?

16 A Yes.

17 Q Please tell us.

18 A Sure. If you look across, I have the account numbers the
19 first column, then the transaction date. And then to the
20 right of that is the deposit, and then to the right of that is
21 withdrawal date and withdrawal amount.

22 As you can see like looking at the second line, for
23 example, on February 2nd, 2009, there was a \$7,980 deposit
24 into her account ending in 0772, and on that same day there
25 was that same amount -- I'm sorry, there was 7,800 withdrawn

1 on February 2nd, 2009, the same date. So \$180 was not
2 withdrawn from that amount.

3 Q You actually, look at the next -- next few entries and
4 tell us about that analysis?

5 A Yes. If you look down the next one, the next transaction
6 listed is dated, it's February 3, 2009 for 5,000, into the
7 account ending in 0772. On that same day there was another
8 transaction into that same account for \$4,000. On that same
9 day, February 3, 2009, there was a withdrawal of 8,800 on one
10 transaction.

11 Q And let me ask you about those transactions.

12 You had earlier talked about structuring. Does
13 structuring have to be an accumulation of deposits?

14 MR. LEE: Objection. Calls for a legal conclusion
15 and his own conjecture.

16 THE COURT: Sustained.

17 BY MR. KAUFMAN:

18 Q Based on your training and experience, Agent MacDonald,
19 what have you come to see in terms of attempts to avoid CTRs
20 in terms of banking activity?

21 MR. LEE: Renew my objection, Your Honor.

22 THE COURT: Overruled.

23 A Well, we often see -- the goal is to avoid having a CTR
24 required. Typically organizations have money in place
25 already, like a large sum. So they go around and they break

1 it up into smaller increments. Based on what I'm seeing here,
2 there's a transaction for just under 8,000 on one day, and
3 then there's two transactions for 9,000 on the second day.

4 These organizations oftentimes have a great deal of money
5 that they are trying to structure in, so it's -- it's -- we
6 see it -- they will go on consecutive days to break it up so
7 their not going and creating a CTR. They are trying to avoid
8 detection.

9 MR. LEE: Well, objection as what they are trying to
10 do.

11 THE COURT: Sustained as what they are trying to do.

12 MR. LEE: Move to strike.

13 THE COURT: The question is: As a result of that
14 activity, did it raise suspicion in your mind?

15 THE WITNESS: Yes, it does.

16 THE COURT: I think we should leave it there.

17 BY MR. KAUFMAN:

18 Q And did you find in looking through 37C, quite honestly
19 the source data, the certified bank documents, similar
20 patterns on numerous occasions?

21 A Yes.

22 Q Now, with regard to Ms. Wade's -- let me turn back to
23 that just momentarily, 38C, just pulling a few dates out, how
24 do the deposits on the left side compare with the withdrawals
25 on the right side?

1 A They are the same amount.

2 Q Now, going to 37C, the figures you just testified about,
3 how there was a small difference between the amount that was
4 deposited and withdrawn, based on your training and
5 experience, can you explain why there might be a difference
6 between two different money launderers' accounts like that?

7 A Could be the method of payment.

8 Q Can you tell explain that further?

9 A Sure. One person may keep -- may be allowed to keep the
10 money in the bank as it comes in; another person may have to
11 pull the full amount out, bring it to whoever they are
12 delivering it to, count out the money and then be paid.

13 Q Now with regard to Ms. LaChapelle's account, I'd like to
14 show you what's been marked Government's Exhibit 85 for
15 identification, and this is a multipage document. Do you
16 recognize what these documents are?

17 A Yeah. This is out of -- these are the withdrawal slips
18 for -- well, some of the withdrawal slips for a couple of
19 different accounts. And account ending in 0772, and I believe
20 there's another account, 2732.

21 Q And are these accounts that are included in your
22 spreadsheets?

23 A Yes, they are.

24 MR. KAUFMAN: Your Honor, we'd move to admit and
25 publish 85.

1 MR. LEE: No objection.

2 THE COURT: Admitted. You can publish.

3 (Government's Exhibit No. 85 received.)

4 BY MR. KAUFMAN:

5 Q All right. We're on page 1, Agent MacDonald. Can you
6 first of all just tell us what the document is and what it
7 tells us?

8 A It's an out-of-state counter withdrawal.

9 Q Why does it have out-of-state counter withdrawal?

10 A Because of it is a transaction that is being completed in
11 a state that is not designated as the state for that account.

12 Q So specifically what is the state designated for this
13 account?

14 A Can you pull up or enlarge the screen, please? North
15 Carolina.

16 Q And how do you know that?

17 A Well, the "North Carolina" is circled.

18 Q Okay. And so that's the state designated, and where was
19 the transaction taking place? That generated it being an
20 out-of-state counter withdrawal?

21 A To the best of my knowledge it was withdrawn in
22 California.

23 Q And, in fact, for Ms. LaChapelle's accounts were able to
24 determine the state of the withdrawals?

25 A Excuse me?

1 Q Were you able to determine the state in which the
2 withdrawals were done for Ms. LaChapelle's accounts?

3 A Most of them, yes.

4 Q And where were they?

5 A California.

6 Q All of ones you were able to determine?

7 A There's some -- I'd have to look at the chart again.
8 There may be some that have a designation code, but the vast
9 majority of them for which I have documentation for were drawn
10 in California.

11 Q You say "the vast majority that you have documentation
12 for," are there any withdrawals that you found that were
13 specifically not in California?

14 A I'd have to look at the chart again. If it's just a
15 number designation, I can't say for sure. I'd have to match
16 it up with another number.

17 Q Okay. So your testimony is that if it's got the
18 designation number, you don't know for sure which state that
19 was, right?

20 A If it just has a designation number. If I've listed just
21 the number on the chart, then that's what I know the branch to
22 be.

23 Q Let me ask it another way, Agent MacDonald.

24 Are there any transactions that you saw that specifically
25 listed a state that was not California?

1 MR. LEE: Objection. Asked and answered, Your
2 Honor.

3 THE COURT: Overruled.

4 A No.

5 Q Okay. Now, with regard to this particular enlargement
6 here -- and first of all, can you tell us the name and address
7 of the individual whose account this is being deposited into?

8 A The named listed on there is Evelyn LaChapelle. The
9 address is list as 853 West Beach Avenue, Inglewood,
10 California.

11 Q And can you tell what type of documentation the depositor
12 provided to the teller?

13 A Yes.

14 Q What information was that?

15 A A California driver's license.

16 Q How can you tell?

17 A If you look just slightly to the right of the middle it
18 has the designation "CA," and then like "DL" something.
19 "D3579311" is a driver's license, California driver's license
20 number, and it lists the expiration date as well.

21 Q All right. So if there is a specific indication of a DL
22 on the deposit slip, does that mean that the individual had to
23 show their ID?

24 A Yeah, that indicates that the teller put the information
25 on the slip.

1 Q Okay. What type of data is on the lower half of the
2 first page of the exhibit?

3 A On the bottom right there is the basically the time stamp
4 designating the time the transaction was done. It lists the
5 teller; various information on the bank; the account number,
6 the amount, the date, the time.

7 Q Okay. And going off of page 2, again similar data?

8 A Yes, sir.

9 Q Page 3. And the date on this transaction?

10 A 5/4/2009. Similar data but it does not have the DL
11 number.

12 Q But it -- does it have the signature of the person making
13 the withdrawal?

14 A Yes.

15 Q Is that at the lower -- the lower left corner?

16 A Yes.

17 Q Page 4, transaction date.

18 A Yes. It's similar information. That day is 6/24/2009.

19 Q It has the same signature for the person making the
20 withdrawal?

21 A Yes. It's got the name listed, address, phone number,
22 the amount.

23 Q And again an out-of-state withdrawal?

24 A Yes, sir.

25 Q Next page, again, the date?

1 A Yeah. 7/18/2009.

2 Q And the same signature block is completed for the person
3 making the withdrawal?

4 A Yes.

5 Q And on this one, in addition to the address, does it
6 include the apartment number?

7 A Yes. Number 8.

8 Q So basically is it fair to say this exhibit continues
9 with the same kind of data, the same information being
10 provided?

11 A Yes.

12 Q And are there even more than just the particular
13 withdrawal slips in this exhibit that you found in the overall
14 certified bank records from Ms. LaChapelle's account?

15 A Yes.

16 Q So this is a sampling?

17 A Yes.

18 Q Let me ask you this: Are there similar documents for the
19 account for Ms. Wade?

20 A Yes.

21 Q And we've already gone through the signature pages. In
22 your review of these thousands of pages of documents, did you
23 ever find a withdrawal in either Ms. LaChapelle's account or
24 Mr. Wade's account where it indicated somebody other than
25 Ms. LaChapelle had made a withdrawal from her account, or

1 Ms. Wade -- or somebody other than Ms. Wade had made a
2 withdrawal from her account?

3 A No.

4 Q I would like to show you what's been marked as
5 Government's Exhibit 72 for that identification. Do you
6 recognize this?

7 A Yes, I do.

8 Q It's a multiple page document. Scroll through. Page 2,
9 page 3, page 4. 5, 6, and 7.

10 What are these documents? Certified records from
11 Ms. LaChapelle's account?

12 A Yes, they are.

13 MR. KAUFMAN: Move to admit and publish 72.

14 MR. LEE: If I could speak with Mr. Kaufman for just
15 a second?

16 THE COURT: You may.

17 (Counsel confer.)

18 MR. LEE: Thank you, Your Honor.

19 MR. KAUFMAN: Your Honor, we move 72 and request to
20 publish it.

21 THE COURT: Any objection?

22 MR. LEE: We have no objection, Your Honor.

23 THE COURT: Let it be admitted and published.

24 (Government's Exhibit No. 72 received.)

25 BY MR. KAUFMAN:

1 Q All right. Agent MacDonald, I'll increase the size on
2 page 1 of the upper portion. Can you tell us what this is?

3 A Yes. That's the cash in-take for -- I'm trying to find
4 the date on there. It's a cash-in ticket. The date indicated
5 on the date block is 5/20/2009. The name listed is, it says
6 Evelyn -- looks like "Campbell" on the top, and then "Goldie
7 Crockett" underneath. It then has 853 West Beach Avenue,
8 Apartment 8, Inglewood, California. The amount is listed as
9 \$8,700 in cash, and \$3,000 in the check into account 0772
10 which belongs to Evelyn LaChapelle.

11 Q And the account number belongs to Evelyn LaChapelle. And
12 in terms of the address, the 853 West Beach Avenue, whose
13 account does that show up on?

14 A Evelyn LaChapelle's.

15 Q Do you know in your investigation a person by the name of
16 Evelyn Campbell?

17 A I do not.

18 Q And you said this is a -- well, let me ask you this: It
19 indicates that there is cash of 8700 and checks of 300. Did
20 you include both of those figures in your spreadsheet?

21 A I only included the 8700.

22 Q Okay. So the 300, which we'll get to in a sec -- let me
23 show you what that is. Going to page 3 --

24 A I misspoke. I thought it said -- on the thing I thought
25 it said 3,000. It's actually 300. The check is 300.

1 Q And what is that \$300?

2 A It's actually a Western Union money order for \$300 and
3 it's made out to Goldie Crockett.

4 Q And then going to the bottom half of page 3, in the
5 endorsement, does that appear to be a name of an individual
6 you recognize from the investigation?

7 A Yes.

8 Q What name does that appear to be?

9 A Robert Brown.

10 Q And then going to page 3, what's this?

11 A This is the front page of the bank statement for which
12 that transaction corresponds.

13 Q And I'm highlighting the portion in the middle. What's
14 that?

15 A That is the transaction that relates to the supporting
16 documentation listing \$9,000 deposit -- yeah \$9,000 deposit.

17 Q And then going to the last page, going towards the
18 middle, what's been enlarged?

19 A That is a transaction on 5/18 for \$8,800, withdrawn from
20 an account -- I'm sorry, a branch in California.

21 Q Now, this indicates 5/18. Do you believe that this is
22 related to the deposit or do you think this is a different
23 transaction?

24 A I'd have to look at all the documentation again.

25 Q Okay. Going to page 1.

1 A I would have to say that withdrawal does not correspond
2 to that particular transaction.

3 Q Why not?

4 A Because the date on the -- on the -- the date that's
5 written in and the date that's on the time stamp is listed as
6 5/20.

7 Q So if the deposit is on 5/20, what date or date range
8 would you expect a corresponding withdrawal to take place?

9 A The earliest I would expect to see it would be the same
10 day but not prior to that date.

11 Q Okay. Now the time that you had found this deposit slip
12 in the Ms. LaChapelle's account, had you already identified
13 Ms. Crockett as a target of the investigation?

14 A Yes, we had.

15 Q Next I'd like to show you what's been marked as
16 Government's Exhibit 73A for identification. Do you recognize
17 this?

18 A Yes.

19 Q And what is this?

20 A That's a cash-in ticket into Ms. LaChapelle's account
21 ending in 0772 for the amount of \$5,000 in cash. Listed on
22 the bottom --

23 Q Actually before you go into more detail, so the deposit
24 slip, as well as the supporting statement, are part of the
25 certified record from Ms. LaChapelle's account?

1 A Yes, sir.

2 Q All right.

3 MR. KAUFMAN: Your Honor, we move to admit and
4 publish 73A.

5 MR. LEE: No objection.

6 THE COURT: Let it be admitted and published.

7 (Government's Exhibit No. 73A received.)

8 BY MR. KAUFMAN:

9 Q Now, can you explain some of the information on this
10 deposit slip?

11 A Sure. It's got -- in the block where it says "list name,
12 address," it has "Evelyn LaChapelle."

13 Q How about the lower left?

14 A The lower left it says "non-account holder, Heather
15 Jones," it has a series of numbers and it says "DL" beside it,
16 and it has an expiration date and an issue date.

17 Q And so does that mean that a person with identification
18 for Heather Jones made in deposit?

19 A Yes.

20 Q Have you identified her during the course of the
21 investigation?

22 A Yes, we have.

23 Q In general terms as what? How so?

24 A As someone who was making deposits for Mr. Lynch.

25 Q Shondu Lynch?

1 A Yes.

2 Q Does that deposit show up in the account statement
3 attached in that same exhibit?

4 A Yes, it does.

5 Q I'd like to show you now what's been marked as
6 Government's Exhibit 73. Just 73. Do you recognize what this
7 document is?

8 A Yes. It's a portion of a teller log.

9 Q Okay. And then following that is a corresponding bank
10 statement from her certified records?

11 A Yes.

12 Q All right.

13 MR. KAUFMAN: Your Honor, we'd move to admit and
14 publish 73.

15 MR. LEE: If I could briefly voir dire, Your Honor?
16 Or I can ask on cross.

17 THE COURT: Save it for cross. I'll admit 73.

18 (Government's Exhibit No. 73 received.)

19 BY MR. KAUFMAN:

20 Q Agent MacDonald, if you would walk us through, you said
21 this is a teller log, and can you remind us what that means?

22 A It's a log. It's a log of transactions that are being
23 done at a branch. It -- if you look up at the top middle, it
24 stays "banking center and teller," it has a designation code
25 for the branch; it has a designation code for the teller. It

1 will also list the account information for the transaction,
2 the type of transaction. It lists the account holder and it
3 indicates what type of document was used when withdrawing, in
4 this particular case when withdrawing the money.

5 Q Just briefly going back to 73A, the date on the Heather
6 Jones transaction here for \$5,000 was what?

7 A 6/24/2009.

8 Q Going back to the teller log 73.

9 A 6/24/2009. Same account number.

10 Q And what other information have you gleaned from this
11 portion of the teller log?

12 A Well, based on the lower right portion, it appears that
13 a -- like a check card was used as the document to withdraw
14 the money.

15 Q And can you explain how that works logistically when
16 you're at the bank?

17 A Yeah. When you withdraw money you can either fill out at
18 withdrawal slip. You can also use a, like a bank card. Slide
19 the card and enter your PIN number.

20 Q You just -- you said a PIN number?

21 A Yes.

22 Q Is that a distinct PIN that's associated with that card?

23 A Yes. Or that -- yes.

24 Q Let's see, I'd like to next draw your attention to 36A,
25 and this is also a multiple page document, five-page document.

1 Do you recognize what this is?

2 A Yes. It's a spreadsheet. It's a spreadsheet listing the
3 cash deposits into Corvain -- into accounts applying to
4 Corvain Cooper or associated with Corvain Cooper.

5 Q Okay. And 36B, do you recognize this multiple page
6 document?

7 A Yes. That would be for the withdrawals from those
8 accounts.

9 Q All right.

10 MR. KAUFMAN: Your Honor, we'd move to admit and
11 publish 36A and B.

12 MS. McVAY: Your Honor, we object to those. It goes
13 back to our previous hearing regarding the bank records.

14 THE COURT: Very well. You have a continuing
15 objection to those records. Overruled. Let them be admitted.

16 MR. KAUFMAN: Thank you, Your Honor.

17 (Government's Exhibit No. 36A, 36B received.)

18 Q Earlier you just testified, Agent MacDonald, that it was
19 for Mr. Cooper and associated accounts. Can you explain what
20 you mean by that?

21 A Yes. At that time this was going on he was with -- he
22 was dating or married to Courtney Bradshaw. They had a joint
23 account. There's also an account in the name of Courtney
24 Bradshaw. And then there was an account in the name of
25 Upscale Consultants LLC, hyphenated, Georgia -- or it's got

1 "Georgia" in parentheses, or "G-A" in parenthesis. He's a
2 signer on account.

3 Q So he has a beneficial interest in all three accounts?

4 A I know he does in the first and second -- sorry, first
5 and third. I don't recall if he was a signer on the second,
6 but we saw the same type of activity happening in that account
7 as well.

8 Q Okay. And have you actually met or spoken with Courtney
9 Bradshaw?

10 A Yes, I have.

11 Q What's her name now, do you know?

12 A Last name Patterson, I believe.

13 Q And the data that you were able to obtain, about when did
14 it start?

15 A January of 2005.

16 Q And it continued until?

17 A July of 2007.

18 Q And in total how much was deposited into these three
19 accounts associated with Mr. Cooper?

20 A \$944,011.

21 Q Now, going to 36B, the withdrawals, this is based on the
22 same set of bank certified documents for Mr. Cooper's accounts
23 and associated accounts?

24 A Yes.

25 Q And with regard to the total amount that was withdrawn in

1 terms of cash deposits -- I mean cash withdrawals?

2 A 786,542.

3 Q Can you explain why there would be a difference between
4 those two figures for Mr. Cooper?

5 A Sure. I was using documentation that I received from the
6 bank. There's also -- not only am I just using documentation
7 received from the bank but there's also transfers that go on.
8 There's other things that happen in the account. I just put
9 into these spreadsheets what appeared to be cash transactions.
10 So I put what -- based on the information I had, that's what I
11 had, that's what I put in.

12 Q So did you happen to notice a large number of transfers
13 and other non-cash withdrawals for monies out from the
14 account?

15 A Yeah. He -- there were -- there were transactions such
16 as debit card usage. I'd have to go through the -- review of
17 the cash -- review the transfers. I believe there were checks
18 written. This just shows cash in or what appears to be cash
19 in and cash out.

20 Q So in an effort to have conservative numbers then you
21 only used the cash transactions?

22 A Yes.

23 Q All right. Next I'd like to show you what's been marked
24 as 82A for identification. Do you recognize this?

25 A Yes.

1 Q What is that?

2 A That is a list, that's data from Keishon Moseley's
3 J. P. Morgan, and I think it was Bank of America account.

4 Q And 83 -- I'm sorry, 82B.

5 A Those are appear to be cash withdrawals from those same
6 accounts.

7 MR. KAUFMAN: Your Honor, we move to admit 82A and
8 82B.

9 THE COURT: Any objection?

10 MR. LEE: No.

11 THE COURT: Let 82A and B be admitted.

12 (Government's Exhibit No. 82A, 82B received.)

13 BY MR. KAUFMAN:

14 Q Agent MacDonald, with regard to A, the deposits, again
15 these are all cash deposits?

16 A They appear to be cash deposits.

17 Q And this data starts when?

18 A November 25, 2009.

19 Q And it ends?

20 A 3/7/2011.

21 Q What are the total figures in terms of deposits into
22 Mr. Moseley's account?

23 A For those accounts, 334,700.

24 Q Going to 83B, same approximate start date and end date
25 for the data?

1 A Yes. 3/20.

2 Q And the total withdrawn?

3 A 324,185.

4 Q Were you finding a similar pattern of money going in and
5 then in close time proximity coming back out?

6 A Yes.

7 Q Next I'd like to show you what's been marked as 35A.
8 This is a multiple page document for five pages; and 35B,
9 again multiple page document, 2, 3, 4, 5, 6. Do you recognize
10 these?

11 A Yes. That's what appear to be cash deposits and
12 withdrawals from accounts belonging to Goldie Crockett.

13 MR. KAUFMAN: Your Honor, we would move to admit 35A
14 and B.

15 THE COURT: Any objection? Let it be admitted.

16 (Government's Exhibit No. 35A, 35B received.)

17 BY MR. KAUFMAN:

18 Q Now, with regard to the time period, Goldie Crockett's is
19 account --

20 A The first transaction listed is April 2, 2007.

21 Q And the last transaction is?

22 A May 29th, 2009.

23 Q And the total amount of cash deposits into her account?

24 A \$1,625,166.

25 Q Going to 35B. So these are the withdrawals?

1 A Yes, sir.

2 Q Starting in the same time range?

3 A Yes. That first one was April 3rd, 2007.

4 Q Then going in the same time frame approximately?

5 A Yes. Approximately. That one ends 12/15/2009.

6 Q And the total withdrawals from her account?

7 A 1,529,155.

8 Q And again you were only using cash transactions for both
9 in and out?

10 A Yes.

11 Q During the course of the investigation after finding
12 these large sums of money going in and out of target's
13 accounts, did the investigation then turn towards tax records
14 for the targets?

15 A Yes.

16 Q Why is that?

17 A To -- we obtained the tax records in order to see what
18 type of income they were -- that they were reporting; to see
19 if the numbers matched up with what was going to the banks.

20 Q Okay. When you say -- when you say -- can you explain
21 further what you're looking for?

22 A I'm trying to determine if the money is legitimate.

23 Q Okay.

24 MR. LEE: Objection as to the characterization.

25 THE COURT: Sustained as to form.

1 MR. LEE: Move to strike.

2 THE COURT: Granted.

3 BY MR. KAUFMAN:

4 Q Agent McDonald, I'm showing you what's been marked as
5 Exhibit 41 for identification. Do you recognize this?

6 A Yes, sir.

7 Q What is that?

8 A It's a Certification of Lack of Records Found.

9 Q And is this actually a certified document from the IRS?

10 A Yes, it is.

11 MR. KAUFMAN: Your Honor, we'd move to admit and
12 publish.

13 THE COURT: Any objection?

14 MR. LEE: No.

15 THE COURT: Let it be admitted.

16 (Government's Exhibit No. 41 received.)

17 Q So you said a Certification of Lack of Record. What does
18 that mean?

19 A It means they are certifying that they could not find the
20 records requested, and further down in the document it lists
21 the records that were being requested.

22 Q And is this indicative of tax returns not having been
23 filed for those dates?

24 A Yes.

25 Q And for this individual, what are the years that were not

1 filed?

2 A Dates listed are December 31st, 2007. December 31st,
3 2008. December 31st, 2009. December 31st, 2010.

4 Q For example, when it says December 31, 2007, that means
5 no tax return was filed for the tax year of 2007?

6 A That's correct.

7 Q Okay. This certification is for whom?

8 A Ms. Natalia Wade.

9 Q Next I'd like to turn your attention to Exhibit 42.
10 Multipage document and, in fact, have you reviewed prior to
11 testifying today all the three defendants tax records?

12 A Yes, I have.

13 Q And is 42, in fact, the set of documents for Mr. Cooper?

14 A Yes, it is.

15 MR. KAUFMAN: Your Honor, we'd move to admit and
16 publish Exhibit 42.

17 THE COURT: Any objection?

18 MS. McVAY: No, Your Honor.

19 THE COURT: Let it be admitted and published.

20 (Government's Exhibit No. 42 received.)

21 BY MR. KAUFMAN:

22 Q Agent MacDonald, is this standard certification for the
23 tax records?

24 A Yes.

25 Q Going on to page 2, what is this that we're looking at?

1 A This is a Form 1040, U. S. Individual Tax Return for 2007
2 for Mr. Corvain Cooper.

3 Q Okay. And I might ask you to help guide us you through
4 the process based on your analysis of these documents, and
5 I'll follow your lead, if you will.

6 What information is relevant for your investigation here?

7 A Would it be possible to enlarge the screen, please? The
8 middle portion.

9 You can see on line 12 he's listing an income or loss,
10 which is attached on a difference form. It's listed as
11 \$12,882. If you go down line 22, it's listing total income as
12 12,882.

13 Q Okay. Shall I go to the next page?

14 A Can you scroll down to the -- then there's like a \$910
15 credit which reduced his amount of income.

16 Q And then what's his adjusted gross income?

17 A 11,972.

18 Q Going to the next page, shall we go to the next year's
19 return?

20 A Sure.

21 Q And, in fact, was there a claim for an earned income
22 credit for that year?

23 A I'd have to look at the form again. But this -- yes,
24 there was, of 4,000 -- \$4,716. Also, if you go -- there's a
25 sheet that reflects the business income. It's listed as

1 "image consulting," Upscale Image Consultants, the address is
2 listed as 925-B Peachtree Street, Suite 320, Atlanta, Georgia.
3 And if you could enlarge the other -- yeah, that area, please.

4 Actually, if you could go down further, gross income is
5 listed as 35281. Could you actually make that area like --
6 yes. It lists -- it lists what the expenses were for the
7 business. He's got listed 3,115 advertising. 6,000 other
8 business property. 1800 utilities. 3600 insurance. The
9 total listed is 22,399 for expenses.

10 Q So then he's claimed total profit for the year?

11 A 12,882.

12 Q All right. And let's see, that was for 2007. Let me go
13 back for a moment to 36A. These are Mr. Cooper's deposits for
14 2007, January to July. Is that correct?

15 A That's correct.

16 Q So the arrow, is that going along the column of the
17 amounts of deposits over time?

18 A Yes.

19 Q Going back to 42, 2008's tax return, what can you tell us
20 about this year?

21 A The business income is listed as \$1,362.

22 Q And, in fact, he got a refund that year?

23 A Yes, he did.

24 Q Okay. Anything else?

25 A No, sir.

1 Q All right. And again is there similar stated income from
2 business with expenses listed as well?

3 A Yes.

4 Q And did the expenses almost exceed the business income or
5 almost match it?

6 A Could I see the screen again? It appears so. Yes.

7 Q Going to 2009.

8 A That's showing his wage and salaries, tips, et cetera, as
9 38,657.

10 Q Anything to note on the next page?

11 A Not really.

12 Q Okay. And then what is this page?

13 A That's the Certification of Lack of Record.

14 Q And is there an indication that there was no tax return
15 for the tax year 2010, '11 and '12?

16 A Yes, sir.

17 Q Next I'd like to show you what's been marked as 40 for
18 identification. Do you recognize this?

19 A Yes, I do.

20 Q What is it?

21 A It's a Certification of Lack of Record for
22 Ms. LaChapelle.

23 Q And are there other documents, certified tax documents
24 from Ms. LaChapelle?

25 A Yes, they are.

1 MR. KAUFMAN: Your Honor, we move to admit and
2 publish 40.

3 THE COURT: Any objection?

4 MR. LEE: I'm trying to see what year we're
5 referring to here, Your Honor. I'm having a hard time.

6 Q Is this a multiple year --

7 A Yes, it is.

8 Q So from 2005 through 2010; is that correct?

9 A That is correct. But the Lack of Record does not cover
10 that entire time span.

11 Q Okay.

12 MR. LEE: We have no objection.

13 THE COURT: Let Government's Exhibit 40 be admitted.

14 (Government's Exhibit No. 40 received.)

15 BY MR. KAUFMAN:

16 Q Okay. So page 1, Agent MacDonald, you said that's the
17 Certification of Lack of Record?

18 A Yes, sir.

19 Q For what years does that cover?

20 A 2003 and 2006.

21 Q Going to page 2, this is for what tax year?

22 A This is for tax period ending in 2004.

23 Q All right. And what was her gross income for the year?

24 A Adjusted gross income 3,454.

25 Q When I say her gross -- her stated gross income?

1 A Yes.

2 Q 2005. Is for 2005, the next page?

3 A Yes, sir.

4 Q What did she claim as wages, salaries, tips?

5 A \$1,434.

6 Q Do you recognize that signature?

7 A Yes, sir.

8 Q Does the look similar to the one from her bank records?

9 A Yes, it does.

10 Q 2007.

11 A Yes, sir.

12 Q What does she claim as her income?

13 A The wages, salaries and tips is listed as \$2,909.

14 Q Does that have her physical signature on there?

15 A Yes, sir.

16 Q 2008. What does she claim in 2000?

17 A \$19,662, and if you look on the address block it lists

18 853 West Beach Avenue in Inglewood.

19 Q And does it indicate the apartment?

20 A Number 8.

21 Q And she physically signed this as well?

22 A Yes.

23 Q And in 2008 is there an indication of her working for a

24 bank?

25 A Yes.

1 Q Which one?

2 A Citibank.

3 Q Now, what tax year are we talking about now?

4 A 2009.

5 Q And in that year?

6 A Wages, salaries, tips, et cetera are listed as 13,777.

7 Q Going back to 37A, the deposit to Ms. LaChapelle's

8 account, this is all for 2009?

9 A Yes, it is.

10 Q What was the total deposits?

11 A \$678,230.

12 Q Okay. I know it's been fun talking about business

13 records and tax records, I'd like to turn your attention now

14 to May 6th of 2010. Were you involved in the arrest of an

15 individual in this investigation?

16 A Yes, I was.

17 Q Who was that?

18 A Mr. Shondu Lynch.

19 Q We've heard some testimony about it. During the arrest

20 were you on the scene?

21 A Yes, I was.

22 Q Did you take any photographs or see any photographs of

23 images that you recognized from the scene?

24 A Yes.

25 Q I'd like to show you what's been marked for

1 identification purposes as 14, and it's a multipage document,
2 page 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13 and 14,
3 those pages have already been admitted. Do you recognize all
4 14 pages?

5 A Yes, I do.

6 Q What are they?

7 A The first, I guess it would be the first 12, were the
8 documents I observed at Mr. Lynch's house. I can't remember
9 if there's one or two pictures of the safe, but the last one
10 or last two pictures were pictures of the money found in the
11 safe.

12 MR. KAUFMAN: Your Honor, we'd move to admit
13 Government's Exhibit 14, pages 1 through 12.

14 THE COURT: Any objection. Let them be admitted.

15 (Government's Exhibit No. 14 received.)

16 BY MR. KAUFMAN:

17 Q Now, did you take these photographs?

18 A I believe I took these photographs. I took photographs
19 of all the documents that were found in the house. Some other
20 people took documents of the photos as well.

21 These appear to be the ones I took because in the later
22 ones it shows that the documents are lying on the carpet and I
23 distinctly remember laying those out on the carpet. So I
24 think this is my series of photographers. If it's not, I at
25 least saw all these documents at the location.

1 Q I'm going to scroll through the pages until you stop me
2 and tell me if there are any that are so important that you've
3 connected back to other aspects of the investigations: Page
4 1. Page 2. And on page 2 can you tell us what that is, for
5 example?

6 A It is a deposit into a Wells Fargo bank account ending in
7 7811 for \$9,000 on 3/10/2010 at 9:22.

8 I'd have to see -- I know from viewing these documents
9 and comparing them to bank documents that we did find
10 documents that were showing the deposits, receipts for
11 deposits going into Ms. Wade's accounts and Williams. I'd
12 have to see their account numbers again to refresh my memory
13 as to which one was which. I mean, there's multiples but I'd
14 have to review the account numbers again, please.

15 Q Do you want me to go back to the summary exhibits then
16 or ...

17 A Yeah, that would help.

18 Q Or as a general matter you're saying that you have sat
19 down with these documents and connected them?

20 A Yes. There are multiple going into Francine Wade's
21 accounts and multiple going into -- I'm sorry, Francine
22 Williams accounts, and multiple going into Natalia Wade's
23 accounts. I can't recall what account numbers they were off
24 the top of my head.

25 Q Okay. Now, do you recognize anything on this page?

1 A Yes, I do.

2 Q What is that?

3 A It's a piece of paper with handwritten information on it.
4 In the left top it has the name "Natalia Wade" written in blue
5 ink. Below it is one of her account numbers.

6 Q Is that, in fact, one of the accounts that indicated to
7 you structuring so you put that into the summary spreadsheet?

8 A Yes.

9 Q Going to the next page.

10 A That is a deposit slip that has been filled out,
11 partially filled out in blue ink for -- the name listed is
12 Natalia Fabulous Jewelry. The date listed 3/5/2010. The
13 amount listed is 9,000 in U. S. currency, and the account
14 numbers ends in -- well, 30011194059.

15 Q And then this next handwritten page?

16 A They are -- a series of numbers. The number that I just
17 read out -- I'd have to see it again but it appears that's the
18 same number with the addition of "3" on the end.

19 Q I'm sorry, that's the same number?

20 A I just read out an account number that was on that last
21 deposit slip, and I believe it's the same number except this
22 one has a "3" in it on the end, like 30011194059. The last,
23 the other picture we were looking at, the numbers written down
24 had that series of numbers but then there was a "3" on the end
25 of it.

1 Also, in the bottom of that other page you had showed me,
2 written down is Natalia Fabulous Jewelry, and there is an
3 account number above that ending in 7811.

4 Q And you just said 7811, this \$7,000 deposit, same bank
5 account?

6 A Yes.

7 Q Did you, in fact, check this against certified records
8 for the account from Ms. Wade, and, in fact, confirm this was
9 a deposit into her account?

10 A To the best of my recollection, yes.

11 Q All right. Let's see, after May 6th, when the seizure
12 took place, did you, in fact, have any other continuing
13 operations with regard to Mr. Lynch?

14 A Yes.

15 Q Can you describe what happened?

16 A In regards to the currency that was found or into just
17 surveillance -- continued to do surveillance and we actually
18 ended up going back to his house and doing a trash pull.
19 Basically taking the trash that was in the trash cans.

20 Q Why did you do that?

21 A To gather more evidence.

22 Q Now, we've heard the term "walling off." Were you
23 attempting to wall-off that stop, that seizure that took place
24 on May 6th?

25 A Yeah. Well, on the May 6th incident we actually didn't

1 even take any of the paper. We just photographed it. We
2 didn't want them to know that, one, the Feds were looking into
3 them; plus we didn't want them to know that there was an
4 interest in all of the documentation that was found at his
5 house.

6 Q You mentioned a trash pull. Can you explain that in more
7 detail?

8 A Yeah. One of our techniques is to pull people's trash
9 once it's off of their property, typically early morning hours
10 so no one can see us, we'll go take the trash and then sort
11 through it.

12 Q Why do you wait until it's off their property?

13 A Because then it's -- then we legally have the right to
14 take it. It's abandoned.

15 Q And on or about June 7th, 2010, did you, in fact, conduct
16 this trash pull?

17 A Yes.

18 Q I'd like to show you what's been marked as Government's
19 Exhibit 19 for identification. Do you recognize it and it's
20 contents?

21 A Yes, I do.

22 Q What are they?

23 A These are some of the items that were pulled from the
24 trash.

25 MR. KAUFMAN: Your Honor, we'd move to admit

1 Government's Exhibit 19 and it's contents and publish it to
2 the jury.

3 THE COURT: Any objection? Let it be admitted.

4 (Government's Exhibit No. 19 received.)

5 MR. KAUFMAN: Ms. Hankins, we have provided on a
6 disk photocopies of these so ...

7 BY MR. KAUFMAN:

8 Q Now, there are two sets of deposit slips that have
9 paperclips. Who put those paperclips on these two sets of
10 documents?

11 A I did.

12 Q Why did you do that?

13 A Well, so I could differentiate between the two, basically
14 put them in a group and keep them separate so I would know
15 which ones were which.

16 Q So it would be quicker during your testimony?

17 A Yes, sir.

18 Q Can you tell us what these two different paperclips
19 contains?

20 A First one I'm holding up contains two deposit receipts
21 for two deposits that went into Ms. LaChapelle's account
22 ending in 0772.

23 Q And then the other one?

24 A The other one contains six deposit slips for deposits
25 going into Ms. Wade's account.

1 Q Ending in 8012?

2 A Sorry.

3 Q Ending in 8012?

4 A I think it was '81. I'd have so look again.

5 (Shows document to witness.)

6 Yes. 8012.

7 Q And is this for 5250 in terms of the amount?

8 A Yes. 5,250.

9 Q I was it 6,000. Is that correct -- is it 6800?

10 A It appears to be 6800. That one appears to be or that

11 one is 3,000.

12 Q Can you tell the month?

13 A January 25th, 2010.

14 That one is listed as October 15th, 2009. It's in the

15 amount of -- that one is a little difficult to read. That one

16 appears to be dated 12/8/2009. This one is a dated 12/5/2009.

17 Q In the addition to these deposit slips, during this June

18 trash pull, did you find other connections to Ms. LaChapelle

19 and/or Ms. Wade?

20 A Yes. We found documentation with handwritten

21 information. Yes, that's one of the items that was in the

22 trash. It has the name "Natalia Wade" and has an account

23 number below it.

24 Q And did you find an envelope with information on it?

25 A Yes.

1 Q And so on the front what does that indicate?

2 A Well, on the front, it's a piece of mail that was
3 delivered. It was mailed by something-S Cleaners to a Shon
4 Lynch as 4300 Sharon Road, Room 420.

5 Q On the back?

6 A On the back it says -- and it's written down "LaChapelle,
7 Evelyn," then there is the account number above ending in
8 0772.

9 Q In fact, is this one of the accounts that is in your
10 spreadsheet of structured deposits and withdrawals?

11 A Yes.

12 Q And do you recognize this?

13 A Yes.

14 Q What is it?

15 A It is a Western Union -- I believe it's a Western Union
16 -- down a little bit. I'm sorry. So I can see the top.

17 Q Well, may I direct your attention to the bottom right?

18 A Yes. It's a Western Union document showing that 3,000
19 was being sent to a Natalia Wade. The name of the sender is
20 listed as Sean Lamar. And also the city is listed as "S-A-N,"
21 and then California.

22 Q Okay. Oh, and do you recognize the name of the customer
23 on this receipt?

24 A Yes. Lasonia White.

25 Q Was she a target of the investigation as well?

1 A Yes, she was.

2 Q Were you personally involved in her arrest?

3 A Yes, I was.

4 Q Let's see. And then I believe you testified earlier
5 about one of the people associated with money laundering. Do
6 you recognize the name on this receipt?

7 A Yes, Heather Jones.

8 Q And the another receipt?

9 A Heather Jones.

10 Q All right. Off the top of your head, do you think I
11 missed any of the documentation from the trash pull?

12 A You have the relevant ones, yes.

13 Q Let me hand up -- I think just couple, check me.

14 All right. I'd like to next turn your attention to
15 July 1st, 2010. Were you involved in a seizure from a Sandra
16 Landers?

17 A Yes.

18 Q Can you describe what happened?

19 A The morning of -- July 1st, that morning I received a
20 call from a UPS on Cornelius. Detective Beaver had previously
21 met with or spoke with employees at the UPS Store. They had
22 called me and told me that there was a box that was being
23 delivered to I believe it was Deandra Sanders. It was an
24 alias of Sandra Landers.

25 They told me the box had arrived. I called some task

1 force officers who were up in the Cornelius area. They
2 responded to the UPS Store, and they got there approximately
3 ten minutes after Ms. Landers had picked up the box and left.

4 Due to a previous surveillance of Ms. Landers when she
5 picked up her box at UPS Store, we thought she might be
6 heading back to the same location she went to last time which
7 was right off of Tyvola.

8 So I called units to go to that area in the hopes that we
9 would find her there. She was spotted as she was coming off
10 77, driving southbound on 77 and turning on to Tyvola.

11 We had a marked unit pull her over. She had an expired
12 tag. We ended up finding the package that was in her box. We
13 ended up seizing -- we ended up searching her house as well
14 and finding documents in the car.

15 Q Did she provide consent for that search?

16 A Yes, she did. We ended up obtaining other documents.

17 Q Okay. Let me stop you there.

18 I'd like to show you what's been marked as 22A and I'll
19 scroll through 20F. Do you recognize these?

20 A I'm not seeing anything on my screen.

21 Q My apologies. 20A, B, C, D, E, and F.

22 A Yes.

23 Q What are they?

24 A They were the -- the first shot is the picture of the box
25 and what was contained in the box on Chrysler, on the vehicle

1 that she was driving.

2 Q Did you recognize all those images from the stop of
3 Mr. Landers and the search?

4 A Yes, I do.

5 MR. KAUFMAN: Your Honor, we move to admit 20A
6 through 20F.

7 THE COURT: Any objection? Let it be admitted.

8 (Government's Exhibit No. 20A thru 20F received.)

9 BY MR. KAUFMAN:

10 Q 20A you were starting to say?

11 A That is the box opened up with what was in the box
12 sitting on -- beside it.

13 Q Let me stop it. Let's show you what's been marked for
14 identification purposes as 21. Do you recognize what this is?

15 A Yes. This is that same box.

16 Q Okay.

17 MR. KAUFMAN: Your Honor, we'd move to admit 21.

18 THE COURT: Any objection? Let it be admitted.

19 (Government's Exhibit No. 21 received.)

20 BY MR. KAUFMAN:

21 Q Going on to 20B, what's that?

22 A That's a closeup of what was inside the box.

23 Q 20C?

24 A That is the top of the box with the label.

25 Q 20D?

1 A That was what was also inside the box with that, the
2 previous picture.

3 Q 20E?

4 A That's the item that was in the box.

5 Q 20F?

6 A That's that same item.

7 Q And with this -- so what was inside the box? Like
8 ultimately the contents of the box?

9 A It was green leafy substance. I'm not sure if it was
10 analyzed or not.

11 Q I'd like to show -- you mentioned there were documents
12 seized. I'd like to show you what's been marked for
13 identification as 24. Is this in fact one of the documents
14 that was found at Mr. Landers' house?

15 A Yes, it is.

16 Q And, in fact, have you --

17 MR. KAUFMAN: Well, we move to admit 24.

18 THE COURT: Any objection? Let it be admitted.

19 (Government's Exhibit No. 24 received.)

20 BY MR. KAUFMAN:

21 Q All right. And have you identified the account and the
22 transaction?

23 A Yes. It's a deposit receipt for -- dated -- sorry.
24 Dated 3/23/2010 for \$5,900 into an account belonging to
25 Ms. Wade ending in 0593.

1 Q I'd like to go back for a moment to 38A. And am I
2 highlighting the portion from 38A that corresponds to the slip
3 you found at Ms. Landers' residence?

4 A Could you -- yes, it is.

5 Q All right. During the course of the investigation, did
6 you have an opportunity to make a search of Ms. LaChapelle's
7 phone that she had after her arrest?

8 A Yes.

9 Q And did you find anything of evidentiary value there?

10 A Yes.

11 Q Can you describe in general terms what they were?

12 A There were several text messages, and there was also a
13 phone number for a Natalia.

14 Q I'm sorry. I just realized, I think the jury was not
15 able to see our last comparisons. My apologies.

16 We're at Exhibit 24, and you had stated you had discussed
17 the --

18 A I'm sorry.

19 Q -- the number, the amount and the date?

20 A Yes. That is a deposit receipt dated 3/23/2010 time
21 stamped 4:15 p.m.

22 Q Going back to 38A again. This is the line that you
23 identified as corresponding to that deposit slip for
24 Ms. Landers?

25 A Yes.

1 Q My apologies.

2 Okay. So going back to after Ms. LaChapelle was arrested
3 and you obtained authority to search it, what type of relevant
4 information did you find?

5 A There were text messages and there was as phone number
6 listed for a Natalia.

7 Q Okay. And do you recall what the text messages stated?

8 A Yeah. They were text messages back and forth talking
9 about smoking marijuana.

10 Q All right. I'd like to show you what's been marked as
11 Government's Exhibit 43. Do you recognize what this is?

12 A Yes, it is.

13 Q What is it?

14 A Those are the text messages that were found within that
15 phone.

16 Q How was this document generated?

17 A From reviewing -- from reviewing the both the phone
18 itself and the document and the download from a forensic
19 person.

20 Q And did you, in fact, generate this directly from the
21 data and the phone?

22 A Yes.

23 MR. KAUFMAN: Your Honor, we'd move to admit 43 and
24 publish it to the jury.

25 THE COURT: Any objection?

1 MR. LEE: We have no objection, Your Honor.

2 THE COURT: Let it be admitted and published.

3 (Government's Exhibit No. 43 received.)

4 BY MR. KAUFMAN:

5 Q All right. Agent MacDonald, have you reviewed certified
6 documents that were provided to us by the defense in reverse
7 discovery for a trust that was from Ms. LaChapelle's
8 grandparents for her benefit and two other of the
9 grandchildren?

10 A Yes.

11 Q I'd like to show you what's been marked as 48A for
12 identification purposes. And this is a rather lengthy
13 document. Several dozen pages. Do you recognize what this
14 is?

15 A Yes.

16 Q What is it?

17 A It's the information regarding the trust.

18 Q And is this what's called an accounting? That is
19 something the trustee has to submit to the Court?

20 A Yes, it is.

21 Q And 48B. Do you recognize what this is?

22 A Yes. That's a list of distributions to Ms. LaChapelle.

23 Q Is that the distributions from the trust?

24 A Yes.

25 MR. KAUFMAN: Your Honor, we'd move to admit and

1 publish 48A and 48B.

2 MR. LEE: No objection.

3 THE COURT: Let them be admitted and published.

4 (Government's Exhibit No. 48A, 48B received.)

5 BY MR. KAUFMAN:

6 Q 48A. Here's 48B.

7 With regard to the distributions, let me go to page 2 to
8 3, to page 4, 5. Now, on page 5 is there an area where you
9 can see transactions or distributions to Ms. LaChapelle for
10 the year 2009 and into early 2010?

11 A Yes, sir.

12 Q And these distributions end in April 2010. Is that
13 because the trust was thereafter dissolved?

14 A Yes.

15 Q And in general in that year 2009, and even earlier than
16 that, what was the ordinary or average distribution that she
17 was receiving?

18 A Well, in '09 the average -- I mean the typical -- typical
19 amount was \$2,500. There's one for less. There's one for
20 more. But that appears to be the typical -- results in larger
21 payments for like college tuition.

22 Q When you say "college tuition," based on your review of
23 the 48A, the accounting, was the purpose of this trust really
24 as an educational trust?

25 MR. LEE: Objection as to what the purpose was. The

1 document speaks for itself, Your Honor.

2 THE COURT: Sustained.

3 BY MR. KAUFMAN:

4 Q Let me ask you this: The total figure from of
5 distributions from June of '95 until early April 2010, what
6 was the total amount that the trust had distributed to her?

7 A \$317,203.01 sent.

8 Q Now, you had done an analysis of several bank accounts
9 for her. Were any of the funds from the trust distributed
10 into those accounts that had indicia of structuring?

11 A No.

12 Q In fact, were you able to locate the account or accounts
13 into which these trust distributions were made?

14 A Yes.

15 Q Was there any transferring of funds, any significant
16 funds between those two accounts?

17 A Not to my recollection.

18 Q So the cash transactions that appear in your spreadsheets
19 for Ms. LaChapelle, are any of those attributable to the trust
20 distributions?

21 A Not from what I could tell.

22 Q All right. Let's turn back to 48A. I'd like to ask you,
23 the document, when you reviewed it, were the trustees planning
24 for the termination of the trust?

25 MR. LEE: Objection, Your Honor. The speaks for

1 itself.

2 THE COURT: Overruled.

3 BY MR. KAUFMAN:

4 Q Turn to Page 20, referring you to lines 23 to 28.

5 What was the subject matter in that portion of the
6 accounting?

7 A Educational plan for the future and eventual termination
8 of trust.

9 Q And does it indicate that that was the plan and that
10 there was a meeting between the attorney as Ms. LaChapelle and
11 the others involved?

12 A Yes.

13 Q I'd like to turn to page 21, lines 10 through 19. Did
14 the trustee discuss the pace of distributions and the cost of
15 maintaining the trust versus the assets?

16 A Yes.

17 Q My apologies. Hold on for one second.

18 And going up to lines 1 through 3, what was the pace?

19 A Very fast.

20 Q Turning to page 24, did the trustee -- turning to lines
21 14 through 19 -- anticipate any funds in the trust remaining
22 after June of 2009?

23 A Can you repeat the question, please?

24 Q This accounting, by the way, let's see -- sorry.

25 What's the date of the accounting to the court?

1 A June 13, 2007.

2 Q So going back to page 24 -- sorry. One sec.

3 Was there a concern that the trust wouldn't last for but
4 two more years? I'm sorry.

5 Concern that it wouldn't last until she graduates in
6 three years?

7 A Yes.

8 Q And also page 25, was the concern expressed by the
9 trustee there?

10 A Yes.

11 Q They were concerned that the rate of spending would be
12 expending all the funds before Ms. LaChapelle graduated in
13 2009?

14 A Yes.

15 Q Did the trustee ask for a special power to give a \$1,000
16 amount to the beneficiaries of the trust for savings?

17 A Yes.

18 Q And in part was there a concern that Ms. LaChapelle
19 hadn't learned the practice of saving money, and so by giving
20 her small amount she might be able to practice, practice doing
21 so?

22 A Yes.

23 Q Did the trust also discuss Ms. LaChapelle's financial
24 condition in general?

25 A Yes, it did.

1 Q And a loan for her to refinance debt?

2 A Yes, sir.

3 Q And basically throughout this page does it go through and
4 talk about how she was being burdened by substantial debts
5 that were at a high rate of interest?

6 A Yes.

7 MR. KAUFMAN: No further questions, Your Honor.

8 (End of direct examination.)

9 - - - - -

10 THE COURT: Call your next witness.

11 MR. KAUFMAN: Thank you, Your Honor. We next call
12 Leamon Keishan Moseley.

13 **LEAMON MOSELEY**

14 being duly sworn, was examined and testified as follows:

15 **DIRECT EXAMINATION**

16 BY MR. KAUFMAN:

17 Q Good afternoon.

18 A Good afternoon.

19 Q Sir, if you would, please, state your full name and also
20 spell your full name for the record.

21 A Leamon Keishan Moseley. First name is L-E-A-M-O-N.
22 Middle is K-E-I-S-H-A-N. Last name is Moseley, M-O-S-E-L-E-Y.

23 Q Mr. Moseley, do you go by any nicknames?

24 A Some people call me Kechez.

25 Q How would you spell that?

1 A K-E-C-H-E-Z.

2 Q Where does that come from?

3 A I'm always a positive person so I'm always kind of
4 smiling, so, you know, the name kind of came about because I'm
5 cheesing. I'm smiling.

6 Q Now, Mr. Moseley, are you here having been convicted of a
7 conspiracy to launder money, that is marijuana trafficking
8 proceeds?

9 A Yes.

10 Q Do you see any of your co-conspirators in the courtroom
11 today?

12 A Yes.

13 Q Who do you see?

14 A Corvain Cooper.

15 Q And can you describe where he's located and what he's
16 wearing?

17 A He's wearing a white shirt with a tie.

18 Q Whereabouts is he sitting?

19 A To the left of me.

20 MR. KAUFMAN: Your Honor, in-court identification of
21 Mr. Cooper.

22 THE COURT: The record will reflect that.

23 MR. KAUFMAN: Thank you.

24 BY MR. KAUFMAN:

25 Q By the way, do you know Mr. Cooper by any nicknames?

1 A Some people call him CV.

2 Q Now, when did you first meet Mr. Cooper?

3 A I met Cooper in the late '90s, somewhere. I'd say '97,
4 '98, around that time.

5 Q How did you meet him?

6 A I actually met him through a friend I went to high school
7 with. His name was Tally. He passed like in 1999. But I had
8 met Tally at a car wash. CV, or Corvain was with him, and
9 from there, you know, I ran into Corvain later on and we just
10 kind of became friends.

11 Q How close friends would you say you were with him?

12 A I was really close friends. I kind of looked at him kind
13 of like a brother.

14 Q How do you feel about him now?

15 A I'm -- I mean, despite, you know, what we're going
16 through, I mean I still have a lot of love for him but we kind
17 of went our separate ways a while ago.

18 Q Let me ask you, let's go back, did you at some point get
19 involved in marijuana trafficking and money laundering with
20 Mr. Cooper?

21 A In the past, yes.

22 Q Can you tell us how it started?

23 A It started I'd say roughly -- it could have been maybe
24 the end of 2003 or I'd say middle of 2004, I had kind of, I
25 was at Corvain's house and he had another friend over there

1 named Darrick. I kind of observed them, you know, kind of
2 packaging some marijuana, and, um, maybe a little bit of time
3 after that I kind of helped Corvain maybe, you know, a couple
4 times, two, three times. Corvain used to kind of work with a
5 guy named Darrick. And I helped him wrap the box a couple of
6 times and send off the box maybe two, three times.

7 Q I'd like to show you what's been admitted already as
8 Government's Exhibit 1H. Do you recognize the person in the
9 this photograph?

10 A Yes.

11 Q Who is that?

12 A That's Darrick.

13 Q All right. Now you said that you were there and you saw
14 this man Darrick and Mr. Cooper packaging marijuana. Can you
15 describe with a little bit of detail what that means what you
16 saw?

17 A That means pretty much using kind of like a wrap to wrap
18 it. Also maybe, you know, place -- like a Bounce, like a --
19 like a -- you know what you use kind of for the dryer, a
20 little Bounce thing, and put it inside of plastic. That kind
21 of sucks the air out, and put it in a box.

22 Q What did the marijuana look like?

23 A It was pretty much tight, like compressed.

24 Q Like a block?

25 A Like a block.

1 Q Can you estimate how large it was or maybe how much it
2 weighed?

3 A If I can remember, I believe they weighed maybe two or
4 three pounds, each block. There wasn't, you know, really big
5 blocks but they were roughly, you know, say two, three pounds
6 per block.

7 Q At any given occasion about how many blocks were being
8 packaged?

9 A I'd say maybe six to eight blocks. I mean I know when
10 you go to send it off, the package, you know, couldn't weigh a
11 certain amount, so it was always, you know, under the weight,
12 I guess for someone to have to deliver it, one person can
13 deliver it so it wasn't pretty heavy.

14 Q And when you say "under a certain weigh to be delivered,"
15 do you know what weight that is?

16 A I don't know that weight.

17 Q What's the largest amount of weight you're aware of being
18 packaged in this fashion to be sent?

19 A Like I say anywhere between maybe 15 and 20.

20 Q Okay. And in terms of the delivery method, what weight
21 was the marijuana being delivered?

22 A We'd use pretty much a carrier, like UPS or FedEx or
23 something like that.

24 Q You were there for the packaging. Were you there for
25 other parts of the process?

1 A Well, the packaging, you know, but I actually rode with
2 him maybe once or twice. Once with him and Darrick, and once
3 with him by himself.

4 Q When you say "him" are you talking about Mr. Cooper?

5 A Yes, Mr. Cooper, to pick up the marijuana.

6 Q Where did you go to pick up the marijuana?

7 A I don't know the actual street, but I know it's pretty
8 much off the freeway, maybe the 10 freeway, or the 60 freeway.
9 Like I say, I went maybe twice, and it was, you know some
10 timing ago, but I don't know the exact street but I did go
11 with him twice.

12 Q Do you remember what year that was?

13 A That could have been roughly around that time. Like, you
14 know, 2004, maybe even 2005.

15 Q Who were the people that Mr. Cooper and you picked the
16 marijuana up from?

17 A There was a Hispanic gentleman.

18 Q Just one?

19 A Yeah.

20 Q The same one both times?

21 A The same one both times. I know he goes by the name of
22 Pete. That's what they call him, Pete.

23 Q Let's see, with regard to the stuff being shipped out,
24 were you aware of where this stuff was coming to, the
25 marijuana?

1 A Coming to or being sent to?

2 Q At the time where were you located?

3 A I was in Los Angeles.

4 Q Where was the marijuana going to?

5 A They would give me an address, the times I went and sent
6 it, it was going to places, they would called South Cackalack
7 which is, you know, I believe South Carolina or -- Carolina,
8 or, you know, they would just says "Cackalack."

9 Q I believe that you're saying you also filled out the
10 shipping information?

11 A Yes.

12 Q And what states -- state or states do you remember
13 sending the marijuana to?

14 A Like I said, around that time it was -- they would call
15 it "Cackalack." I can't remember was it exactly like north or
16 south because I only did it a couple of times. I know he did
17 have, you know, a friend in Atlanta. I may have sent maybe
18 one box there but it's been some time.

19 Q Do you know who the friend in Atlanta was?

20 A You said a friend?

21 Q You said that he was also sending to somebody in Atlanta.
22 I thought you said a friend but --

23 A I had maybe sent a box to Atlanta.

24 Q Do you know who you were sending to in Atlanta?

25 A No. He has a friend in Atlanta. They call him C.

1 Q Have you ever meet C?

2 A I've met C before.

3 Q I'd like to show you what's been admitted Exhibit 51,
4 page 54. Do you recognize the individual on the screen?

5 A Yes. Looks like Big C.

6 Q The person in Atlanta?

7 A Yes.

8 Q All right. Now, you were talking about Cackalack. Do
9 you recall any shipments going to Charlotte?

10 A I'm not positively sure, because like I said, it's been a
11 while, but I know, you know, Cackalack is the Carolinas. So
12 if it -- if it did come to North Carolina or South Carolina, I
13 believe, you know -- like I said, I'm not exactly for sure on
14 the city.

15 Q Do you know any other people associated with Big C?

16 A I know C's girlfriend.

17 Q How do you know Big C's girlfriend?

18 A He has a girlfriend named Clinet, and I had met her just
19 when we were young, you know, going to clubs or partying, so
20 just pretty much small talk. Actually, you know, was able to
21 kind of communicate with her again later as I saw her in LA
22 with Big C.

23 Q Was she associated with the drug trafficking, money
24 laundering conspiracy?

25 A I'm not sure about Clinet. I know that was his

1 girlfriend.

2 Q Let me show you also in Exhibit 51 page 31. When you say
3 "Clinet" -- I'm enlarging a portion here, is that how you
4 would spell "Clinet"?

5 A That's how I would spell it.

6 Q All right. In the addition to the packaging and the
7 sending of the marijuana, did you ever speak to -- well, who
8 else did you encounter during the drug trafficking conspiracy?

9 A Anthony. Anthony Alegrete, you know, Corvain Cooper.
10 You say who else did I encounter?

11 Q Yeah, who did you meet face to face? Who did you speak
12 to on the phone regarding the drug trafficking or the money
13 laundering associated with drug trafficking?

14 A I spoke with, like I said, C on the phone. There was
15 also another guy, Corvain Cooper; new name E. All I knew was
16 his initial was E. Throughout this whole situation, when I
17 was in Mecklenburg, I kind of ran into a Daniel, which goes by
18 the name of Crockett.

19 Q Let me clarify, was he involved with the stuff that you
20 were aware of while you were in the middle the conspiracy or
21 do you meet him after the fact?

22 A No, I had knew him prior, him -- Daniel, Anthony and
23 Corvain went to high school together so, you know, I kind of
24 met them both through him.

25 Me and Daniel haven't spoken in years. I did see him

1 maybe once, if that, the last couple -- couple of years ago
2 until I was in Mecklenburg, you know, kind of moved into the
3 housing, ended up leaving the same day. But other than that,
4 I didn't have the too much contact with Daniel.

5 Q Do you know of somebody involved in this by the name of
6 Lamar?

7 A Lamar. Yes. I know Lamar.

8 Q Let me show you what's been submitted as 1a. Do you
9 recognize who this is?

10 A Yeah. That's Anthony.

11 Q Do you recognize who this is?

12 A Yes. That's Lamar.

13 Q How about 1D?

14 A That's Daniel.

15 Q All right. You mention that you went with Mr. Cooper to
16 the Hispanic source of supply. What was Daniel's involvement?

17 A You know, I'm not too sure. I did, like I said, I'd see
18 Corvain. He had like a little loft downtown near the stable
19 center, and Daniel and Lamar, they were all there, and that's
20 when I had seen Daniel.

21 Daniel had a house kind of up in Hollywood Hills and I
22 had rode up there one time, you know, with them, but I guess
23 it was just really trying to show off his property, the house
24 that he had up there.

25 Q Was it just social or was it related to the crimes?

1 A It was social but I mean he had a pretty big nice house.
2 It was pretty like empty, not a whole lot of furniture, but I
3 did observe some marijuana in the garage.

4 Q How much?

5 A It was wrapped. I can say maybe between 20 and
6 40 pounds.

7 Q Can you tell what type of marijuana it was?

8 A It was the same type of cooked pressed marijuana.

9 Q What did you and Mr. Cooper call marijuana of that grade?

10 A We would call it reggie; stress.

11 Q Did you ever see any marijuana that was other than reggie
12 or stress that you and Mr. Cooper were trafficking?

13 A That's pretty much, you know, what I would see.
14 Sometimes you would see some of it a little loose but I
15 believe it was still kind of the same grade. It was not so
16 compressed.

17 Q Tell us about the money laundering charge that you pled
18 guilty to. What specifically were you doing?

19 A Well, I had a couple of bank accounts just of my own, and
20 Corvain would pretty much send me a text and ask me pretty
21 much can I pull out a certain amount of money. And I would,
22 you know, in return I was able to keep \$100, or maybe 200.
23 You know, the most I would get would be \$250. So I would give
24 him an account number. He would meet with me. I give him the
25 amount he wanted me to pull out, and I would pretty much go my

1 way.

2 Q How did you get paid? You told us about the amounts, but
3 how did you actually get the money?

4 A I would have to go inside and withdraw it.

5 Q When it was deposited into your account, did you withdraw
6 the full amount?

7 A I would withdraw pretty much the full amount if I really
8 needed the \$200 at that given moment, or a lot of most times I
9 would just leave my little portion, the \$200, in there just
10 because I would use that to keep up my regular bills, small
11 bills that I had, so I would leave that in my account just
12 because.

13 Q So when you were withdrawing the money what did you do
14 with it?

15 A I would call, you know, let them know that I withdrew it
16 and I would meet with them, meet with Corvain and pretty much
17 give it to him.

18 Q Okay. Going back for a second, Mr. Moseley, you
19 mentioned you had between I believe you said 20 and 40 pounds
20 of marijuana at Daniel Crockett's house. Do you recall what
21 year that was?

22 A That could have been somewhere between -- I mean, I would
23 say 2010. Around that time. I'm not sure exactly but I'll
24 say 2009, 2010.

25 Q Who was with you when you were at the house?

1 A It was me, Corvain and Daniel.

2 Q When did you start using your accounts for the money
3 laundering?

4 A It was around 2009.

5 Q When did it stop?

6 A I would say by 2011, if that.

7 Q So for that period, from 2009 to 2011, you were receiving
8 drug proceeds and for all those transactions you were giving
9 the money to Corvain Cooper?

10 A Yes. I would give it to him. He also had, like I said,
11 someone else that he, I guess, knew or kind of worked with
12 named E, that he had let kind of stay at his loft downtown.
13 But it would be, you know, either one or the two, but the
14 majority of it was Corvain.

15 Q Do you know of anybody else who Mr. Cooper utilized like
16 yourself to launder proceeds?

17 A I mean he would use, you know, girls. Just, you know,
18 girls are more -- they wouldn't run off with the money as
19 opposed to just any guy.

20 Q Well, you're a guy.

21 A Yeah. But I'm pretty trustworthy. I mean ...

22 Q And I guess, well, at that point you had known Mr. Cooper
23 for how long?

24 A Yeah, I had known him for a while. Over ten, could have
25 been 15 years. I'd known him for a while.

1 Q Now, when you say there were some other females who were
2 doing what you were doing for Mr. Cooper, did Mr. Cooper tell
3 you that?

4 A Yeah. I mean, you know, you'd see, if you would have,
5 you would know, like, you know, his kid's mom or something
6 like, or just friends or girls that he would talk to, you
7 know, I guess he'll use their accounts, you know.

8 Q And he told you that?

9 A Yeah.

10 Q Did Mr. Cooper ever, during the course of the conspiracy,
11 tell you about a time that he had been robbed?

12 A Yes.

13 Q Tell us about that.

14 A He pretty much told me, I guess he was doing some
15 business with guys in LA.

16 MS. McVAY: Your Honor, I'm going to object to this
17 being irrelevant; outside the scope of this case.

18 THE COURT: Overruled.

19 Q Go ahead.

20 A I know he was doing business with some guys in LA. I
21 believe they have a little circle called Having Things or
22 something like that. I believe he had done business with them
23 once. Maybe everything went well. And I guess he did
24 business with them a second time and I guess this particular
25 time he had placed whatever they were exchanging in the trunk.

1 Q Exchanging what? What kind of business are we talking
2 about?

3 A I believe it was marijuana. I wasn't there but I believe
4 it was marijuana.

5 MS. McVAY: I object. It's speculation.

6 THE COURT: Overruled.

7 Q What did Mr. Cooper tell you it was?

8 A It was marijuana.

9 Q Okay. And what happened that second time?

10 A And the second time he got into the car to receive
11 payment and someone put a gun out on him to pretty much rob
12 him and snatched -- I guess another guy in the car snatched
13 his chain, and he kind of snatched his chain back and kind of
14 backed out of the situation.

15 Q What, if anything, did he tell you he did as a result of
16 that robbery?

17 A I know he told me he did get a gun, but I haven't, you
18 know, physically didn't see it, but he did tell me, you know,
19 that he did get a gun.

20 Q What did he tell you he did with the gun?

21 A He didn't really go into what he did. I know he said he
22 did have a gun because of that situation.

23 Q So to protect himself during drug deals?

24 A Just to protect himself.

25 MS. McVAY: Objection, Your Honor.

1 THE COURT: Sustained as to the leading.

2 Q Did he tell you why he bought the gun?

3 MS. McVAY: Objection. Asked and answered.

4 THE COURT: Overruled.

5 A Just because he had got robbed, and, you know, so that
6 type of situation he just had a gun to protect himself.

7 Q In September of this year -- well, I'm sorry.

8 In September, just last month, did you receive a letter
9 from Mr. Cooper?

10 A Yes.

11 Q And, in fact, have you provided the original of that
12 letter to law enforcement?

13 A Yes.

14 Q I'd like to show you what's been marked as Government's
15 Exhibit 45 for identification. It's previously been provided
16 to defense, a photocopy of it at least.

17 (Hands document to witness.)

18 Do you recognize Government's Exhibit 45?

19 A Yes.

20 Q What is it?

21 A It's a letter from Corvain Cooper from Mecklenburg to my
22 mom, addressed to my mom at my address.

23 Q And when you say "your mom," Kevin Dawn Scott, is that
24 your mother's name?

25 A Yes.

1 Q Do you know whether Mr. Cooper knew your mother?

2 A Yes, he knew her, because like I said, pretty much like a
3 brother to me. He kind of stayed with me at my house in the
4 late '90s. She knew him pretty well just because, like I
5 said, he would be around me. We were kind of like brothers at
6 one particular point.

7 Q How do you feel about testifying against Mr. Cooper?

8 A I didn't want to testify against Mr. Cooper. I mean like
9 I said, I have a lot of love for Mr. Cooper, not just -- I
10 apologize for being here. It's just ...

11 Q Mr. Moseley, I've taken the contents out of the envelope,
12 this double sided letter and then this one page printed with
13 some handwriting. Where these the contents -- where these in
14 this envelope that Mr. Cooper sent to you?

15 A Yes.

16 MR. KAUFMAN: I'd like to move 45 into evidence and
17 to publish it to the jury.

18 THE COURT: Any objection?

19 MS. McVAY: No, Your Honor.

20 THE COURT: Let it be admitted and published.

21 (Government's Exhibit No. 45 received.)

22 BY MR. KAUFMAN:

23 Q Now, you mention that this was addressed to your mother.
24 The date is September 5, 2013. Did you have any sort of court
25 hearings around that time period?

1 A Yes. I had a court hearing within maybe -- within a
2 week. Under a week, just a couple of days.

3 Q What kind of hearing was that?

4 A It was a plea, a plea hearing for me to enter a plea.

5 Q And before your plea hearing, did you have another kind
6 of hearing?

7 A Yes, I did have a hearing before then.

8 Q Did you have that hearing in this courtroom?

9 A At this courthouse. I'm not sure if it was this room.

10 Q Did you have a detention hearing?

11 A Yes, sir.

12 Q Was I trying to have you detained at the time?

13 A Yes.

14 Q What was the result?

15 A I was able to continue going to school and to be released
16 with, you know, electronic monitoring, GPS, and all that
17 stuff.

18 Q Whose decision was that?

19 A The judge. Judge Conrad.

20 Q Now, had you communicated the fact that you were released
21 on bond to Mr. Cooper at that time?

22 A No.

23 Q All right. Does that help explain why the letter was
24 going to your mother and not to you?

25 A Yes.

1 Q If you would, maybe what I should do is ask you to read
2 the letter.

3 A "September 5th, 2013.

4 "Mom: How is it going? It's very hard to get any
5 paperwork on this case. This is the craziest thing I've ever
6 seen. They are trying to turn me and Keishan against each
7 other because they have nothing on us, but whatever Daniel,
8 Anthony or Darrick told them and our bank accounts, and they
9 are trying to give me 15 or 11 to 15 years deal and life if I
10 lose at trial. But I got to take it to trial. This is a case
11 based on words from criminals.

12 "From the statements I've heard from Courtney, Lamar,
13 they both put me in it but said Keishan had nothing to do with
14 it. Tell him please don't talk on the jail phones. They are
15 taping everything and will use it against him. Anything.
16 They don't play fair here. They don't play fair down here and
17 they are doing anything for a conviction.

18 "I start trial on October 7th. Remember, they only have
19 what people tell them. They don't know S-H-I-T and didn't do
20 any investigation. We're in jail and they don't even have any
21 weed. It's crazy because I'm praying we all make it out of
22 this alive. God's got our back.

23 "They took my clothing line and website, closed my
24 accounts, my car, and any safe deposit box, all on the
25 information Daniel gave them. Let Keishan know it's death

1 before dishonor on mine. I love him and love you, mom, and I
2 pray all this will come to pass.

3 "Love you. Call my mom or Suzan. Any questions or
4 concerns Keishan should be cool. If he did the taxes on the
5 bank accounts, he can say the money came from anywhere."

6 Then it has his girlfriend's number and his mom's number
7 on here.

8 Q All right. Thank you.

9 Based on this letter, what do you think the purpose of
10 this letter was from Mr. Cooper?

11 A Just to pretty much say all of this is pretty much all
12 off of words from people that's kind of already in there, in a
13 situation. And, you know, since they were saying, you know, I
14 really wasn't part of this, that I should be -- I should be
15 cool. I should be okay. And, you know, not to talk on the
16 phones and how, you know, down here they don't play fair and
17 will do anything for a conviction. So it was just kind of ...

18 Q What about if you were asked about your bank accounts?

19 A Oh, I can say the money came from anywhere.

20 Q What does that mean?

21 A Well, I mean I've always tried to, at least kind of pay
22 my taxes and all that type of stuff. He knows I've tried to
23 take care of all the important stuff, just -- just -- the
24 type of person I am. So since he know I probably did my taxes
25 and different things like that, that I can just kind of say it

1 came from a different source other than me withdrawing the
2 money and kind of giving it to him that was deposited into my
3 account.

4 Q So was he trying to convince you to tell lies about what
5 actually happened?

6 A Yes.

7 Q And you've, in fact, pled guilty and taken responsibility
8 for your involvement in the conspiracy. Is that right?

9 A Yes. Most definitely. As soon as I came down here, this
10 whole situation, I just wanted to accept my responsibility and
11 this whole thing, just so I can get it behind me and continue
12 to move forward.

13 Q There was an additional one that was printed out with
14 some handwriting on it. By the way, did you recognize, have
15 you -- before getting to this letter, have you seen
16 Mr. Cooper's handwriting before?

17 A I've seen his handwriting before.

18 Q You're able to recognize it?

19 A I recognize it when he sent the letter, you know, just --
20 if I just saw some writing, I wouldn't just say that's his
21 writing but I do know his handwriting.

22 Q And the way that he writes in terms of the language he
23 uses?

24 A Yes.

25 Q So that letter did come from Mr. Cooper or didn't it?

1 A It came from Mr. Cooper.

2 Q With regard to this document that's up on the screen now,
3 what's your understanding as to what this is and why it was
4 sent to you?

5 A It's pretty much -- it looks like, like I said, Anthony's
6 name on there and that's he's cooperating. Darrick is
7 cooperating. And just who is cooperating. And it looks like
8 it doesn't have the anything by my name because, you know, I
9 entered my plea a couple of days after, you know, I had got
10 the letter, so maybe he didn't know my situation and all this
11 shit. And like I said, he sent this to my mom to let her know
12 basically what's going on.

13 Q Sorry if I'm asking something you have already answered,
14 but the money that was going into your account that you were
15 withdrawing, where did that come from?

16 A To my knowledge it was coming from Atlanta.

17 Q And what was the source?

18 A From who?

19 Q No. No. Like what was the basis for that money?

20 A Well --

21 Q What kind of activity generated that money?

22 A Well, I withdraw the money and just gave it to him, went
23 my separate ways, so I wasn't around to actually see
24 physically what was being done with it or even been to Atlanta
25 to see, you know --

1 Q Let me ask it this way, Mr. Moseley. Was that money from
2 sales of artwork, from gambling, from something else?

3 A I believe it could have been the sales from --

4 MS. McVAY: Objection, Your Honor. Speculation.

5 THE COURT: Overruled.

6 A It may have been from the marijuana that Corvain was
7 into.

8 Q Was that based on your conversations with Mr. Cooper?

9 A I would just pretty much get a text about what to
10 withdraw. I would withdraw that money, give it to him, and go
11 my separate way.

12 Q Mr. Moseley, are you saying that you don't really know
13 where that money was from? What activity created that money?

14 A I know Corvain and C did have a marijuana kind of program
15 going on, so I believe Big C did deposit the money. If Big C
16 deposited the money, I gave the money to Corvain, the money
17 may have come from marijuana sales.

18 Q When were you last involved in any of this conspiracy
19 with Mr. Cooper?

20 A I'd say maybe it could have been maybe from 2011, because
21 the last pretty much times I really hung out with Corvain was
22 just pretty much giving him the money that was deposited in my
23 account, kept my little portion, and really went my own way.
24 We haven't hung out like that in a while.

25 MR. KAUFMAN: Nothing further, Your Honor.

1 (End of direct examination.)

2 **DARRICK JOHNSON**

3 being duly sworn, was examined and testified as follows:

4 **DIRECT EXAMINATION**

5 BY MR. KAUFMAN:

6 Q Good afternoon.

7 A Hello.

8 Q If you would please state your name full name for the
9 record.

10 A Darrick Johnson.

11 Q How do you spell first name?

12 A D-A-R-R-I-C-K. Johnson. J-O-H-N-S-O-N.

13 Q Mr. Johnson, are you here having pled guilty and been
14 convicted for a drug trafficking conspiracy involving over
15 thousand kilograms of marijuana as well as a related money
16 laundering conspiracy?

17 A Yes.

18 Q Do you see in the courtroom today any of your
19 co-conspirators?

20 A Yes.

21 Q Who do you see?

22 A Corvain Cooper.

23 Q And where is he and what's he wearing?

24 A White shirt. Right there to the left.

25 THE COURT: Before you ask any other questions,

1 ladies and gentlemen of the jury, Mr. Kaufman has, with this
2 witness and a previous witness, asked the witness to identify
3 his co-conspirator.

4 You may hear evidence that a certain witness has
5 pled guilty to an offense, and I instruct you that that fact
6 is no evidence of the guilt of any other defendant. And so
7 you should not consider the fact that a particular witness
8 pled guilty to an offense in and of itself as any evidence
9 against any other defendant.

10 Mr. Kaufman, I'd ask you to rephrase your question
11 going forward.

12 MR. KAUFMAN: Yes, Your Honor.

13 BY MR. KAUFMAN:

14 Q Now, by the way, Mr. Johnson, do you have any prior
15 felony convictions in the last ten years?

16 A Yes.

17 Q What are they?

18 A A marijuana case.

19 Q A marijuana possession felony?

20 A Yeah. Possession of marijuana.

21 Q And do you recall what year you were convicted?

22 A I believe an estimate 2006, 2007 I believe.

23 Q Now, you said you recognized Mr. Cooper. When did you
24 first meet Mr. Cooper?

25 A I met Cooper in 1992.

1 Q How did you meet him?

2 A Through a mutual friend, Will Williams, the Williams
3 family, and I met him -- that's how I met him, through a
4 mutual friend, Will Williams.

5 Q Did there come a time that when you started selling
6 marijuana with Mr. Cooper?

7 A Yes.

8 Q When was that?

9 A I started -- I started selling marijuana with Mr. Cooper
10 estimating around 2004, 2005.

11 Q Have you been selling marijuana prior to doing that with
12 Mr. Cooper?

13 A Yes.

14 Q Tell me about the state of your business, your marijuana
15 business, when you met Mr. Cooper and then how that all
16 happened?

17 A Repeat the question for more time?

18 Q Can you tell us about how you started selling marijuana
19 with Mr. Cooper?

20 A Okay. It started in 2004, 2005, and at that time I was
21 selling big marijuana; a lot of marijuana.

22 Q When you "a lot," can you quantify it?

23 A I was selling like about, roughly about 100, 120 a week.

24 Q 100 to 120 what?

25 A Pounds of marijuana.

1 Q What type of marijuana?

2 A Low grade; mid-grade type of marijuana.

3 Q Okay. How much were -- who was your source of supply
4 when you started working with Mr. Cooper?

5 A A Mexico cat named P, that we called P.

6 Q Were you primarily buying the low grade or the medium
7 grade?

8 A The low grade.

9 Q Roughly what percentage of your business was low grade?

10 A About 60, 70 percent.

11 Q How much were you paying P for the low grade?

12 A It was averaging about \$350 at that time.

13 Q How much were you selling it for?

14 A I was selling it for 650 out here in North Carolina.

15 Q Where else were you selling to, if anywhere?

16 A I sold some weed -- excuse me, in Atlanta, Georgia, and
17 that's about it.

18 Q Who were your customers in Atlanta?

19 A One of the customers was Clyde, also known as Big C.

20 Q I'd like to show you what's been admitted as Exhibit 51,
21 page 24. Do you recognize who is in this image?

22 A Yes.

23 Q Who is that?

24 A That's Clyde, also known as Big C.

25 Q Now, who were your customers in North Carolina?

1 A I was dealing with Logie. Tavarus Logie.

2 Q I show you what's been admitted as 1K. Do you recognize
3 who that is?

4 A Yes. That's Logie. Tavarus Logie.

5 Q Do you know if he had a nickname?

6 A Yeah. He was known as LA.

7 Q Did he have any other nicknames?

8 A I've known him as LA, or Lo.

9 Q LA or Lo?

10 A Yes.

11 Q Now you said you were moving about 100 to 120 pounds per
12 week. Was that how much you were moving when you started
13 working with Mr. Cooper?

14 A Yes.

15 Q Please describe what your relative responsibilities in
16 the conspiracy were?

17 A Well, I Corvain go get the weed from my source, Mexican
18 P, also with Anthony Alegrete. Will just wrap it up and send
19 it off. So I would give Corvain a percentage of roughly about
20 25 percent, and I would give Anthony, you know, another
21 25 percent. So between them, they'll have the 50 percent and
22 I have 50 percent.

23 Q When you say -- excuse me, these percentages, are you
24 talking about the percentage of the marijuana itself?

25 A Yes, the marijuana itself.

1 Q And then what did each of the three of you do with your
2 relative percentages?

3 A What I did was reinvest. They would reinvest. They
4 would buy jewelry, cars, clothes. Buy things for girls.
5 That's about it.

6 Q And I'd like to show you what's been admitted as 1A. Do
7 you recognize who this is?

8 A Yes. That's Anthony Alegrete.

9 Q So he was one of the guys that got 25 percent.

10 Now, are you talking about after you received the
11 marijuana from P, these 25 -- 25 and 50 percentages, are you
12 talking about that you would literally divide up physically
13 the marijuana, or are you talking about profits or what are
14 you talking about?

15 A Well, what I'm talking about is like let's say, for
16 example, like Will purchased like 40 pounds. 20 pounds will
17 be for me; 10 pounds will be for Corvain; and then the other
18 ten pounds will be for Anthony.

19 Q What did you do with those 10, 10 and 20 pounds?

20 A Oh, ship it out to North Carolina.

21 Q Did you ship it out separately?

22 A No, shipping it in one box.

23 Q Okay. Tell me about the process. Who did what from the
24 point of getting the marijuana from P, paying him then or
25 later; whether you had to unpack it and repack it, send it

1 however you sent it. Can you go through that process briefly?

2 A Okay. I would either give the money to Corvain or
3 Anthony Alegrete. Either/or would do the job. And then I
4 would have one of them get materials, such as like Saran Wrap,
5 tape, boxes. This thing that we used, it was like a vacuum
6 sealer, like a suck machine, whatever, sucks the package --
7 you know, put the weed inside the sealer and suck it, vacuum
8 seal, so it would be a tight close.

9 Q It would pull the air out?

10 A Yes.

11 Q Then what?

12 A Then we'll wrap it up. Then either one of them will go
13 to a location, to an UPS facility, and ship it, and then
14 they'll come back and give me the receipt.

15 Q Then you mention that your customers were Lo or Logie,
16 and Big C, Clyde. When they received the marijuana then what
17 happened after that?

18 A Well, after that they would send me the money.

19 Q How soon thereafter and how did they send it to you?

20 A They would send the money in an VCR, or chalk, like a
21 paint chalk kind of sort of thing. They'll seal the money and
22 put it inside the VCR, or the chalk, the paint chalk, and then
23 send it back to Los Angeles UPS and it will be like the next
24 day, next day air situation.

25 Q Was that always the way that the money was sent back to

1 you?

2 A Yes.

3 Q Did you ever use banks?

4 A Yes.

5 Q When did you first use banks?

6 A I started using banks maybe -- an estimate around maybe
7 2009 maybe.

8 Q Can you describe how you used the banks?

9 A Well, they would go to the bank and they'll do a deposit
10 under \$10,000. They'll do deposits of like 8,000, 9,000. Lo
11 would do this. And then I would get the money and go back
12 into buying more marijuana.

13 Q Did you say that you started using the banks in 2009?

14 A Roughly, estimated time.

15 Q So when you say roughly is it possible it was earlier
16 than 2009 or you think it was later than 2009?

17 A I don't recall.

18 Q Who was involved in that money laundering component of
19 the drug trafficking conspiracy?

20 A It was me, Lo, Anthony, Corvain.

21 Q Did any of you use other people to help in the process?

22 A Yes.

23 Q Tell us about that.

24 A We'll use -- like you said, we'll use other people such
25 as like girls and different guys and pretty much try to find

1 whoever we can use that was interested in making a couple of
2 dollars off doing it.

3 Q How do you select the people to do the money laundering
4 part of the conspiracy?

5 A We would select whoever was interested in making a dollar
6 or two. When I say a dollar or two, maybe a hundred dollars,
7 two hundred dollars that was willing to receive a package from
8 their house or through money laundering through the bank.

9 Q How many people did you personally use in order to
10 receive funds yourself?

11 A I probably used over about -- over five people; five, six
12 people definitely.

13 Q Did Mr. Cooper or Mr. Alegrete know who you were using?
14 Did he discuss it with them openly?

15 A No, not really.

16 Q Why not?

17 A Because I was the person in charge of the money, and then
18 I would just pay them their percentage of what they put in.

19 Q Now, when do you recall your last -- sorry, just a
20 second.

21 (Pause)

22 In terms of the marijuana transactions that you were
23 doing directly with Mr. Cooper, when do you recall the last of
24 those types of transactions taking place?

25 A What do you mean, as far as like with Big C and Lo?

1 Q Yes.

2 A I'd say by the end of 2009 that's when we probably
3 stopped doing it. Then we continued in 2012, 2013 brokering,
4 he was brokering marijuana, exotic marijuana for me.

5 Q I'm sorry.

6 A I was saying he was brokering exotic in 2012, 2013.

7 Q Are you saying 2012, 2013, are you saying that after you
8 stopped doing this particular type of transaction with
9 Mr. Cooper, that after that from 2009 through 2012 and '13?

10 A No, I stopped dealing with them around 2009 and then
11 picked back up around 2012.

12 Q And who were you brokering the deals with? I'm sorry, I
13 believe you said he was brokering the deals. Can you tell us
14 about how that arrangement was?

15 A I would give him the marijuana and he'll broker it up. I
16 have a certain fee that he has to give back to me, and then
17 he'll broker it and come back with the change.

18 Q So he was -- he wasn't part of the profit or loss on the
19 transaction. Is that what you're saying? That he was just
20 bringing you and the buyer together?

21 A I had my percentage. Of course I'm sure he made his
22 percentage, too, but as far as what I wanted back was my fee.

23 Q Have you ever seen Mr. Cooper with any sort of firearm?

24 A Yes.

25 Q Can you tell us about that?

1 MS. McVAY: Your Honor, I renew my objection I
2 previously stated.

3 THE WITNESS: Very well. Overruled.

4 Q Please, go ahead.

5 A Yes. Roughly around 2004, 2005, I seen -- I was in his
6 car. We started smoking marijuana. He pulled out a lot of
7 money out of the center console, and that's when I seen the
8 revolver in the center console.

9 Q Can you describe it?

10 A The revolver?

11 Q Yes.

12 A It was black.

13 Q Now you have mentioned that -- let me show you a
14 photograph for a second. Do you recognize this person?

15 A Yes.

16 Q Who is that?

17 A Keishan.

18 Q Was he part of the conspiracy?

19 A Yes. He'll help out.

20 Q How did he help out?

21 A He had, um, bank accounts that we'll use.

22 Q Did he help in other ways?

23 A Um ...

24 Q Was he involved?

25 A I mean he didn't really help me. But as far as like he

1 helped me with the money laundering like once or twice.

2 Q Did he ever handle the marijuana in any way that you can
3 recall?

4 A No, I can't recall. I know I sold marijuana to him
5 before.

6 Q Who was he directly working for?

7 A He was working with Corvain.

8 Q So did he ever report directly to you?

9 A No.

10 Q Now, you mentioned that you were brokering deals after
11 2009 on behalf of Mr. Cooper until, I believe, you said 2012,
12 2013. When were you arrested?

13 A 2013. January.

14 Q I'm sorry?

15 A January 2013.

16 Q How close in time to your arrest was your last brokering
17 transaction for marijuana with Mr. Cooper?

18 A It was fairly recent because I dealt with them on a
19 regular basis communicating with him, seeing what did he have,
20 does he have any deals going, does anybody need any marijuana,
21 or just keeping up on a rapport with him.

22 MR. KAUFMAN: No further questions, Your Honor.

23 (End of direct examination.)

24 - - - - -

25 MR. KAUFMAN: Thank you, Your Honor. The United

1 States calls Daniel Crockett.

2 **AHMED CROCKETT**

3 being duly sworn, was examined and testified as follows:

4 **DIRECT EXAMINATION**

5 BY MR. KAUFMAN:

6 Q Good afternoon.

7 A Hello.

8 Q Can you please state your full name for the record and
9 spell your last name for the record?

10 A Ahmed Crockett. My last name is C-R-O-C-K-E-T-T.

11 Q Is Daniel part of your name too?

12 A Yes. That's my middle name. Yes.

13 Q Have you pled guilty and, in fact, been sentenced for a
14 marijuana trafficking conspiracy involving over a thousand
15 kilograms as well as a related money laundering conspiracy?

16 A Yes.

17 Q Did you at your sentencing hearing receive 20 years for
18 those offenses?

19 A Yes.

20 Q And do you have prior convictions as well for burglaries,
21 assault with a deadly weapon, grand theft -- actually two
22 charges of grand theft?

23 A Yes.

24 Q I'd like to ask you with regard to marijuana
25 trafficking/money laundering, do you see anybody in the

1 courtroom today that you were doing that with?

2 A Yes.

3 Q Who do you see?

4 A LaChapelle and Natalie Wade.

5 Q Anybody else?

6 A Corvain Cooper.

7 Q Can you describe where they are and what they are
8 wearing?

9 A Corvain Cooper is wearing a white dress shirt. Natalia
10 Wade is wearing a black, I guess, a blazer, and LaChapelle,
11 Evelyn, is wearing a -- like a scarf around her neck.

12 Q Are you referring to the individuals who are sitting at
13 the table to my right?

14 A Yes.

15 MR. KAUFMAN: May the record reflect in-court
16 identification of three defendants.

17 THE COURT: It will.

18 BY MR. KAUFMAN:

19 Q Thank you.

20 Let me ask you, Mr. Crockett, when did you first start
21 with marijuana trafficking?

22 A Maybe around 2000 -- what, '3 or '4.

23 Q When did you first get involved with Mr. Cooper in that
24 endeavor?

25 A The same time, 2003, 2004.

1 Q So did you start together at the same time?

2 A Well, he was already trafficking in marijuana before me,
3 and he introduced me to trafficking in marijuana, like kind of
4 taught me how to, like, wrapping and shipping and stuff like
5 that.

6 Q Who else was he working with when you got involved?

7 A Darrick Johnson. Anthony Alegrete. Logie. Big C. A
8 couple other guys. RJ.

9 Q So when you started, can you tell us about how the
10 process worked?

11 A Well, I'd buy marijuana from a guy named P, or guys from
12 San Diego. Wrap it up. Go to Staples or Office Depo, wrap up
13 the marijuana. Buy supplies. Wrap up the marijuana at our
14 apartment or a hotel. Take it to FedEx. Ship it off
15 overnight. A guy out here received it, maybe Shondu Lynch or
16 Logie, and they will distribute it. Once the proceeds come
17 back, they will put it in bank accounts and they will withdraw
18 it in California or Los Angeles.

19 Q I'd like to show you a few photographs. These have
20 already been admitted. 1H. Do you recognize who this is?

21 A Yes. That's Darrick Johnson.

22 Q How is he involved?

23 A He was a supplier/distributor.

24 Q And what was his association with the organization?

25 A He was like, like one of the main guys at that time.

1 Q When you say "at that time," what time?

2 A 2003, 2004, 2005, '6.

3 Q 1I, do you know what that is?

4 A Sharon Kelsey.

5 Q Do you know her nickname?

6 A Kadija.

7 Q What was her role?

8 A She was a distributor out here, so she'll distribute

9 marijuana out here to different buyers.

10 Q Did you name this individual already?

11 A That is Logie.

12 Q 1L.

13 A Shondu Lynch.

14 Q Now, in the beginning what method with you using to ship?

15 A Overnight boxes; FedEx, UPS.

16 Q Can you quantify how much you were moving over time?

17 A Per day we were probably doing 40 pounds, 80 pounds every

18 day.

19 Q When you say "every day," I mean how many days of the

20 week were you doing that?

21 A Monday for Tuesday, Tuesday for Wednesday, Wednesday for

22 Thursday, Thursday for Friday. So every day. Every working

23 day that FedEx ships besides Saturday.

24 Q And was that year round?

25 A Year round, yes.

1 Q How long did you keep up that pace?

2 A Every year.

3 Q Did you ever have more than one shipment in a day?

4 A It depends -- yes. Yes, we have.

5 Q How many -- how much was the most you ever shipped in a
6 given day?

7 A Maybe 160 pounds.

8 Q You're talking about using --

9 A Overnight.

10 Q The overnight method?

11 A Yes.

12 Q Were there any other methods that you used?

13 A Yes. We'll ship marijuana in containers and truck it.

14 Q When you say "trucking," can you describe what you mean
15 by that?

16 A We'll put marijuana in a crates with drum barrels, you
17 know, package up maybe 300 pounds, 400 pounds. Ship it in a
18 truck. Five days.

19 Q What type of marijuana were you shipping?

20 A Just regular like brick marijuana. Sometime Arizona.
21 That's like a fluffy type of marijuana.

22 Q Can you give a rough approximation of what percentage was
23 regular grade versus Arizona fluffy?

24 A What do you mean?

25 Q Well, were you sending more regular or the Arizona?

1 A We were sending more regular. At the time it was more
2 Arizona but -- to Charlotte it was compressed marijuana, but
3 to Atlanta it would usually be Arizona.

4 Q Why was there a difference?

5 A Because in Charlotte they don't have like enough money to
6 buy the fluffy, so they prefer the brick marijuana. It's
7 cheaper. In Atlanta, there's more money to spend so they'll
8 want the exotic, like the more expensive type stuff, like the
9 Arizona. They were like picky.

10 Q I would like to show you what's the contents of Exhibit 3
11 that has already been admitted. Do you recognize these?

12 A Yes.

13 Q How do you recognize this?

14 A These are bricks that we bought from P.

15 Q How can you tell?

16 A I know them. I have been dealing with them so long, I
17 know.

18 Q You mentioned shipping boxes. Did you say you also ship
19 by crate -- I'm sorry, by truck?

20 A Yes.

21 Q What kind of truck?

22 A Semi-truck. 18-wheeler.

23 Q How much marijuana was in the semi-truck when you used
24 it?

25 A Depends on different types. Anywhere between 300 pounds,

1 400 pounds, 500 pounds. In between 300 to 500 pounds.

2 Q How many times did you use that method?

3 A Maybe 40 times or 50 times around that time.

4 Q And for those shipments was Mr. Cooper still involved in
5 this with you?

6 A Yes.

7 Q What specific kind of things was Mr. Cooper doing
8 vis-a-vis what you were doing?

9 A Repeat that?

10 Q What kind of things as part of the organization was
11 Mr. Cooper doing as opposed to what you were doing?

12 A We kind of did the same thing because he was like my
13 helper, so if I needed someone, you know, to pick up boxes,
14 he'll go pick up boxes. If I need someone to go pick up money
15 out of an account, he'll go and get the money. If I need
16 somebody to help me wrap, he'll help me wrap. It was kind of
17 like a buddy system. We just helped each other out left and
18 right.

19 Q So would you say that he was your assistant?

20 A Yes.

21 Q And was that the relationship you had throughout the
22 period of conspiracy?

23 A No. Sometimes we were partners and sometime, you know,
24 he assisted me. But, you know, partnership and assistance is
25 the same thing because it's just a matter of what you invested

1 in the -- into the shipment at that time. So it's not like
2 you're assisting, you're just assisting. You're a partner
3 because you invested say half.

4 Q When you say "invested," can you describe what you mean
5 by that?

6 A Well, you know, if we're sending 40 pounds, 50 pounds of
7 marijuana, you say, okay, I want to send my 30 pounds. I say,
8 okay, well, give me the money for 30 pounds. He'll give me,
9 you know, whatever it costs for 30 pounds and I'll take that
10 and buy his 30 pounds and buy whatever I'm going to by and
11 ship it off.

12 Q So were you the one who was going to the source of
13 supply?

14 A Yeah. I would go to the source if we couldn't, like if I
15 couldn't get -- my source didn't have any marijuana, we'll go
16 to one of his sources and buy marijuana but usually we'll go
17 to my source.

18 Q Who was your source?

19 A P, and the guys in San Diego and Mexico.

20 Q What are Mr. Cooper's sources?

21 A Little Johnnie. The twins.

22 Q Did you ever meet his sources?

23 A Yes.

24 Q Now, did you ever ship by commercial crates?

25 A Yes.

1 Q Can you describe how that worked?

2 A It was a -- we'll go to a place in San Diego called
3 Orange County Crating. I'll usually go get a crate made.
4 We'll buy two drum barrels, 55-gallon drum barrels.

5 Q When you say "we" who is "we"?

6 A Me and Corvain Cooper. Buy fertilizer. Place it in the
7 barrels with the marijuana.

8 Q Why fertilizer?

9 A Kill the smell. Throw the dogs off so, you know, dogs is
10 usually want to alert. Throw the scent off of the marijuana
11 or whatever. Get the dogs distracted with the scent of the
12 fertilizer, another animal. Crate it up. Drop it off at the
13 shipping company. Wait our three to five days, you know, send
14 it to Charlotte, North Carolina.

15 Q Okay. I'd like to show you what's been admitted already
16 as 2V. Does this look familiar?

17 A Yes.

18 Q What is this?

19 A That's the crate with the drum barrels.

20 Q All right. 2E?

21 A Yeah, that's the crate with the drum barrels, fertilizer
22 and marijuana.

23 Q 2F?

24 A That's all the marijuana.

25 Q And does that look similar to the size, packaging and

1 number that you would ship in these crates?

2 A Yes.

3 Q When you were shipping them, how did you identify the
4 person who was shipping the marijuana? Did you give your real
5 name?

6 A No. I used a fake ID.

7 Q I'd like to show you what's been admitted as Government's
8 Exhibit 6. Sorry. Hold on one second.

9 When you say "fake ID," did you use -- I guess ther was
10 an alias of some kind?

11 A Yes.

12 Q Was it just one or multiple ones?

13 A Multiple.

14 Q Do you remember any of names you used?

15 A Yes. James Roberts. Steven Edgar. What's another one?
16 Those are the only two I can remember off the top.

17 Q Okay. You said James Roberts. I'm highlighting an area
18 right there.

19 A Yes.

20 Q Is this one of the shipping labels that you sent?

21 A Yes.

22 Q Do you remember a crate from January 9th, 2009?

23 A I remember around that day but, yes, I remember that
24 crate.

25 Q What happened?

1 A It was confiscated by the Homeland Security in Charlotte.
2 Mecklenburg Sheriff's.

3 Q Do you remember about how much marijuana was in that
4 crate?

5 A Yeah. Maybe 300 -- over 300 pounds.

6 Q All right. You mentioned that you had a fake ID. I'm
7 showing you what's been admitted as 79A, second to last page.
8 Increase the size. Do you recognize this?

9 A Yes.

10 Q What is it?

11 A One of my fake IDs.

12 Q And so is "Phillip Davis" one of the names you used?

13 A Yes.

14 Q I'm showing you what's been admitted as Government's
15 Exhibit 62. This is a Bill of Lading from a document that's
16 already been admitted. I'd like to ask you do you recognize
17 any names?

18 A Yes. Mark Macrone.

19 Q How do you recognize that?

20 A That was one of my fake ID names.

21 Q Do you recognize the names "Harvey Goodman" or "Chris
22 Deal"?

23 A Yes.

24 Q How do you recognize those names?

25 A That's one of my aliases I drove under. Christopher

1 Deal.

2 Q Now after the January 9, 2009, you mentioned the seizure
3 by Homeland Security of that crate. Did you know that
4 Homeland Security had seized it?

5 A No.

6 Q What did you believe at the time it happened?

7 A I believed that one of the guys I was working with stole
8 the crate.

9 Q Who was that person?

10 A Gerren Darty.

11 Q Do you recognize who is in Exhibit 1E?

12 A Yes, that's Gerren Darty.

13 Q What did you do as a result of your suspicions?

14 A At that time he had -- I gave him some money to go to the
15 airport, around a hundred thousand, a little bit more, what
16 not, and I told him to come back. Bring me back my money. He
17 came back. Brought me the money and we had a couple meetings
18 about where the crate was or what happened and everything like
19 that. And we stopped dealing with him. And, you know, that
20 was basically it with Gerren Darty.

21 Q Did you continue sending crates, though?

22 A No.

23 Q Do you remember an incident with Kadija regarding a
24 crate?

25 A Yes.

1 Q What happened?

2 A Oh, I'm sorry. Yes, we did.

3 We kept on sending crates for a couple more months, and
4 another crate came up missing and that's when Kadija stole the
5 crate.

6 Q And when you say "stole the crate" what do you mean by
7 that?

8 A Well, she said the police actually confiscated the crate.
9 She actually -- the police didn't confiscate the crate. She
10 just stole the crate, told us a lie and ran off with the
11 money.

12 Q How did you figure out it was a lie?

13 A Couple of my sources told me that she stole the crate,
14 and then her baby daddy, her daughter's father, Wayne, came
15 out that he stole the crate. She went to Las Vegas to start
16 her own program.

17 Q So when you figured out she had stolen the crate, what
18 did you do?

19 A We just started working with Shondu Lynch.

20 Q Okay. Did you take any efforts to try and make contact
21 with Ms. Kelsey-Brown after the crate was stolen?

22 A Yes.

23 Q Describe what you did?

24 A Went to the phone company, pulled up her phone records.
25 Went back to her house. Monitored her phone calls. Just

1 stuff like that. Until -- try to find her but we never found
2 her because we didn't put too much effort into it. Just
3 started working straight with Shondu.

4 Q Well, when you say you didn't put too much effort into
5 it, did you stay in California?

6 A No. We flew out to Charlotte, North Carolina.

7 Q When you say "we" who is "we"?

8 A Me and Corvain Cooper.

9 Q So you flew out to where?

10 A We flew to Atlanta, then we drove to Charlotte, North
11 Carolina.

12 Q What did you do when you were in Atlanta?

13 A We borrowed a Corvette from Big C.

14 Q And so you and Mr. Cooper borrowed the Corvette. Did Big
15 C come with you?

16 A No, he did not.

17 Q So you're in the Corvette with Mr. Cooper. What did you
18 do then?

19 A We drove to Charlotte, North Carolina. Went to Kadija's
20 house. See if the anything was -- because she said the police
21 actually raided her house. So we went to her house to see if
22 the house was raided. It wasn't raided. And then we went,
23 checked into a hotel room to sleep in.

24 I called a couple of my sources out here, like Shondu
25 Lynch, and Yomi, and June, and basically we met up with them

1 to figure out everything that was going down here to find
2 money. We actually found around \$30,000 that was with a guy
3 named Ronald Hargette. And, you know, he told us he was going
4 to give me money like that day or the next day. We went to
5 his barber shop. He told me he was going to call me later on
6 in the day. Bring me the money. He never did.

7 So I had to stay that night in Charlotte. Corvain Cooper
8 had to leave and go back home. Well, he wanted to leave and
9 go back home because he didn't want all those problems out
10 here. So I drove him back down to Atlanta.

11 Q Can I stop you for a second?

12 A Yeah.

13 Q Before you went back to Atlanta, did either you or
14 Mr. Cooper try to make phone contact with Ms. Kelsey-Brown?

15 A Yes, we did.

16 Q What happened? Who made contact and --

17 A Well, I made contact with Kelsey-Brown first. And I was
18 talking to her after she said, you know, she had got arrested
19 or what not. So I was basically asking her what's going on?
20 What's the problem? And she basically told me that she is
21 investigated or what not. Just a long story.

22 And she hung up the phone -- I hung up the phone, what
23 not. She called back and talked to Corvain Cooper and he
24 basically cussed her out. Hung up the phone. That was that
25 with the contact with Sharon Kelsy.

1 Q So after that crate was so-called stolen, did you
2 continue to send crates?

3 A No. I stopped right after that.

4 Q When you stopped right after that, you stopped selling
5 marijuana altogether?

6 A No. I just stopped sending crates.

7 Q What did you do after that?

8 A I started sending overnight packages to Shondu Lynch.

9 Q And at that point was it just you or was Mr. Cooper still
10 involved?

11 A Mr. Cooper wasn't involved at that point because he
12 didn't really want to deal with the Shon at that time. So
13 what I did, I just basically dealt straight with Shon and I
14 was buying marijuana from Mr. Cooper when I couldn't get it on
15 my own.

16 Q So after that second, the stolen crate in 2009, you were
17 still occasionally buying from Mr. Cooper?

18 A Yes.

19 Q And I believe you mentioned some sources, Little Johnnie
20 and some others. Were those still the same sources that
21 Mr. Cooper had?

22 A Yes.

23 Q Is that how the relationship continued over time with
24 Mr. Cooper or did it change again?

25 A No, that's how it -- that's how it ended. We just went

1 on like that until basically a couple months before I got
2 arrested.

3 Q When were you arrested?

4 A I don't know. Sometime in the summertime or early
5 summer.

6 Q When you say you were arrested, are you talking about
7 when you were stopped in Culver City by local law enforcement
8 or when you were arrested on federal charges?

9 A No, with Culver City.

10 Q Does April 2010 sound right?

11 A That's about right.

12 Q I believe you said it was a couple of months before that?

13 A Yes.

14 Q Why a couple of months?

15 A Because Corvain Cooper and Big C -- well, they were
16 fronted maybe 50 pounds of marijuana. And he told me to help
17 him wrap it and send it out to Atlanta. I helped him ship it,
18 send it out to Atlanta and it got confiscated by the Atlanta
19 Police Department and he basically accused me of stealing the
20 package.

21 Q Who is "he"?

22 A Corvain Cooper.

23 Q Now, did you have like an actual break-up so to speak or
24 did you just kind of quietly stop dealing with each other?

25 A Just stopped calling. Quietly break up. It wasn't like

1 we were enemies, nothing like that. Just stop calling. Doing
2 our own thing. There was too much chaos going on.

3 Q Let me ask you about the other side of the trafficking,
4 the money side. How did that work?

5 A We needed people to open up accounts for us so we can
6 deposit money into the accounts we withdraw in California. So
7 basically Corvain Cooper would recruit people to open up
8 accounts for us.

9 Q When you say Corvain Cooper recruited the people, did you
10 ever recruit people?

11 A Yes, I have, a couple people of my own.

12 Q Such as?

13 A Pawn. Anna. My wife.

14 Q Your wife is Goldie?

15 A Yeah, Goldie Crockett.

16 Q Who are some of the people that Mr. Cooper recruited?

17 A LaChapelle. Anna. Couple people. I can't -- I don't
18 know all the names but I know LaChapelle.

19 Q How do you know her?

20 A Because he introduced me to LaChapelle and told me she
21 was going to open up an account so we can deposit money into
22 her account.

23 Q Do you recall when that took place?

24 A Maybe in 2000 -- late 2008, early 2009. More likely
25 2008. I believe 2008.

1 Q How often did you see Ms. LaChapelle? Was it just that
2 one time when Mr. Cooper introduced her to you?

3 A No. I seen her every time she would withdraw money off
4 of the account.

5 Q How come?

6 A Because we'll meet with her at the bank. She'll give us
7 of the deposit, the cash.

8 Q Did she keep any of the money herself?

9 A Yeah. She'll keep her profit.

10 Q How much was that?

11 A \$200 per withdrawal.

12 Q Was it always exactly 200?

13 A Yes. Per account. Per withdraw.

14 Q Were there ever times where it was a little less or a
15 little more?

16 A Well, if she invested in the marijuana sales, yes, she
17 received more.

18 Q Did she, in fact, invest in the marijuana?

19 A Yes.

20 Q At what point did she start doing that?

21 A Once she got pregnant, she started investing into the
22 marijuana sales.

23 Q Do you know why that started happening at that time?

24 A Because Corvain Cooper told her she was pregnant, so, you
25 know, for the baby, she might as well invest a little bit of

1 her money and make more money, save it up. She'd have a
2 little nest egg for the baby.

3 Q Approximately how many times did you meet Ms. LaChapelle
4 that she had given you cash?

5 A I can't say. Maybe 30 times or something like that.

6 Q Are you aware from speaking to Ms. LaChapelle or
7 Mr. Cooper about the two of them needing this money where you
8 were not present?

9 A Yes.

10 Q Did that happen often?

11 A Not too often.

12 Q Did you ever see Ms. LaChapelle socially?

13 A Yes. Maybe twice.

14 Q Can you describe those events?

15 A We went to a -- we rented a Cadillac truck. Went to
16 Malibu to have dinner. Kind of like a double date. You know,
17 she was socializing with Corvain. I had a woman with me. We
18 just went to dinner, had some drinks, and dropped them back
19 off at their house.

20 Q Was Goldie at that point ever with you and
21 Ms. LaChapelle?

22 A No.

23 Q Now, you said that Mr. Cooper recruited Ms. LaChapelle
24 into the conspiracy. Do you know how Ms. Wade got involved?

25 A LaChapelle told us that --

1 MR. GSELL: Objection, Your Honor.

2 THE COURT: Overruled.

3 A LaChapelle told us she had a friend interested in making
4 money, so we're like, okay. Me and Corvain was like okay.
5 Well, we'll meet her.

6 So she told us her name. And she was going to introduce
7 us to her but one of our other buddies, Lamar Harris, he told
8 us that, you know, he had another girl that was interested,
9 too, and when he introduced us to the girl, she ended up being
10 the same woman that LaChapelle was going to introduce us to so
11 we're just, Hey ...

12 Q You mean that Mr. Harris was also going to introduce you
13 to Ms. Wade and independently Ms. LaChapelle was going to?

14 A Yes.

15 Q You mentioned that Ms. LaChapelle said that she had a
16 friend. Do you know what connection Ms. LaChapelle and
17 Ms. Wade had?

18 A I think they are either cousins or good friends because
19 they are from the bay area of Los Angeles.

20 Q When you say "cousins," did anybody indicate that they
21 were cousins?

22 A Yeah, they said something like they are related or
23 something near that.

24 Q Who said that?

25 A LaChapelle and Natalia.

1 Q They both told you that they were related to each other?

2 A Yes.

3 Q Did you speak to Ms. Wade during the course of the
4 conspiracy?

5 A Yes.

6 Q How often?

7 A Every day.

8 Q How come?

9 A Because she was another person withdrawing the money from
10 her account.

11 Q And who was Ms. Wade providing the funds to?

12 A Directly to me.

13 Q How was Ms. Wade getting compensated for what she was
14 doing?

15 A She was making \$200 per transaction.

16 Q Do you recall whether she was first providing the money
17 to you and then getting paid or if she was keeping the money
18 in the account?

19 A She was taking all the money out and then taking her \$200
20 out of each transaction.

21 Q Did you ever discuss with either Ms. LaChapelle or
22 Ms. Wade the size of the transactions?

23 A Yeah.

24 Q Can you describe that for the jury?

25 A We told them that the transaction size was going to be

1 9,000 per account. She needed to open up two bank accounts.
2 I'd provide her with an address in Charlotte, North Carolina.
3 Open it up on the Internet. And once it's opened, give us the
4 account number and then we'd start putting money in it.

5 Q Did you say that you provided the address in North
6 Carolina?

7 A Yes.

8 Q Do you recall what the address was?

9 A No, I don't recall the address.

10 Q Did you provide the same or different addresses to
11 Ms. LaChapelle and Ms. Wade?

12 A Different addresses.

13 Q Do you know where Ms. LaChapelle lived?

14 A Yes.

15 Q Where?

16 A In Inglewood, California, off of Beach Street.

17 Q Beach Street. Breach Avenue?

18 A Beach Avenue.

19 Q Not to try and test your memory out here, but you
20 actually remember the address?

21 A No.

22 Q Had you been to the location?

23 A Yes.

24 Q Do you know where Ms. Wade lived?

25 A Yes.

1 Q Where?

2 A She live off of 47th Street in -- what's that, Normandy
3 in Los Angeles, California.

4 Q You mentioned 9,000 for the transactions. Were all
5 transactions \$9,000?

6 A Yes. For the most part, every transaction. Maybe one
7 probably be 8500, just to make up the change or whatever, so
8 one would be -- out of all of those probably five at the most,
9 8500 or 9500, something like that, just in case there was an
10 extra hundred, but usually they are all \$9,000.

11 Q Why that number?

12 A To keep it under the IRS. Keep it under the radar from
13 the IRS basically.

14 Q Did you ever discuss that with Ms. LaChapelle or
15 Ms. Wade?

16 A Yes.

17 Q With which one?

18 A Both.

19 Q Do you know what they did for a living, for
20 Ms. LaChapelle first?

21 A LaChapelle's worked at the bank, and Natalia didn't have
22 a job.

23 Q Was that at all times throughout the conspiracy?

24 A Yes.

25 Q Do you know if she ever had a connection with banks?

1 A Who?

2 Q Ms. Wade?

3 A No, I never knew she had a connection, if she did, with
4 the bank.

5 Q Do you know a person by the name of Francine Williams?

6 A Yes.

7 Q Who is she?

8 A She is Natalia Wade's friend.

9 Q Would you say she is her friend, just a friend or do you
10 know her from the conspiracy?

11 A I know her from the conspiracy through Natalia Wade.

12 Q How did Ms. Williams get involved?

13 A Natalia Wade introduced us to Francine -- Francine
14 Williams, and, you know, basically told her to open up an
15 account because she could make some money too.

16 Q Did you have the same arrangement with Ms. Williams?

17 A Yes.

18 Q Earlier you mentioned San Diego.

19 A Yes.

20 Q What was in San Diego?

21 A One of my connections to purchase marijuana.

22 Q When you went to San Diego, to that source, did anybody
23 ever accompany you?

24 A Yes. Natalia Wade went with us a couple times.

25 Q Why did Ms. Wade come with you?

1 A Because we needed to get the money in San Diego because
2 we were basically rushing.

3 Q Why were you rushing?

4 A Because the money was probably placed in the account
5 late, or we're late leaving or a problem like that. Or
6 sometimes we just needed a person to drive because we didn't
7 want to drive.

8 Q For those occasions when you were kind of rushing, you
9 went to San Diego, was the payment side of the transaction
10 similar to what you've already described or did it differ
11 somehow?

12 A Repeat your question?

13 Q Well, you're saying when you were late --

14 A Yes.

15 Q -- that you were rushing. When you were late, was the
16 money flow the same way, through bank accounts?

17 A Yes.

18 Q Did you ever utilize Western Union to send funds -- to
19 receive funds?

20 A No.

21 Q You mentioned instructions to Ms. LaChapelle with regard
22 to opening up accounts for that purposes of laundering these
23 drug proceeds. Who, if anybody, was with her when she opened
24 up the account?

25 A I don't know who was with her, but she initially opened

1 her bank account on line. But one transaction, when she went
2 in the bank in Beverly Hills on Robinson, basically the bank
3 manager was suspicious.

4 MR. GSELL: Objection, Your Honor. Speculation.

5 THE COURT: Sustained. Ask your next question.

6 Q Mr. Crockett, what you were about to testify to was based
7 on conversations you had with Ms. LaChapelle?

8 A No, I was there at the bank.

9 Q Okay. So you, personally, heard what was being said and
10 done?

11 A No, but the actions of the bank manager and making her
12 open up an account at that present moment in California, and
13 he would not -- he would not -- give her the funds at that
14 time until she opened up a bank out in California. And then
15 he transferred the money over into that account, and she was
16 able to receive the money the next day.

17 Q Now, you're talking about an account being opened in
18 California. Can you tell us where were all these money
19 laundering accounts based out of?

20 A North Carolina.

21 Q Why is that?

22 A So the money can be withdrawn the same day instantly in
23 California, because it's -- Bank of America has two systems to
24 where the computers in -- computers east of the Mississippi
25 don't communicate with the computers west of the Mississippi,

1 so if you deposit money in North Carolina today, the money
2 wouldn't show in California until the following day when the
3 money is transferred to both systems. So we'll use North
4 Carolina accounts, and so the money can be withdrawn that same
5 day.

6 Q How did you learn that?

7 A Just through my experience working with the banks.

8 Q And did you explain that to any of the defendants in the
9 courtroom today?

10 A No.

11 MR. KAUFMAN: Nothing further, Your Honor.

12 (End of Direct Examination.)

13 - - - -

14 MR. KAUFMAN: United States calls Shondu Lynch.

15 **SHONDU LYNCH**

16 being duly sworn, was examined and testified as follows:

17 **DIRECT EXAMINATION**

18 BY MR. KAUFMAN:

19 Q Good afternoon.

20 A Good afternoon.

21 Q Sir, if you would please state your full name and also
22 spell your full name for the record.

23 A Shondu Lynch. S-H-O-N-D-U-L-Y-N-C-H.

24 Q Don't get too close to the microphone because it will
25 cause a little feedback.

1 Mr. Lynch, are you here having not only pled guilty to,
2 but also having been sentenced for a drug trafficking
3 conspiracy, money laundering conspiracy, as well as a firearm
4 offense?

5 A Yes.

6 Q Are you back here in Mecklenburg County having been
7 brought back from the Bureau of Prisons?

8 A Yes.

9 Q Do you know what your release date is, projected release
10 date from the prison?

11 A 2017.

12 Q Do you see anybody in the room with whom you're familiar?

13 A Yes.

14 Q Tell us who they are, where they are located and what
15 they are wearing.

16 A Corvain. He's wearing a white shirt with a green tie.

17 Q Is he over at counsel's table over there?

18 A Yes.

19 Q How do you know him?

20 A We have done business together. He was a partner of
21 mine.

22 Q When you say business and a partner, what are we talking
23 about?

24 A The marijuana, selling marijuana.

25 Q Where are you from?

1 A I'm from Concord, North Carolina.

2 Q And have you lived in North Carolina your whole life?

3 A Yes.

4 Q Tell us how did you come to meet Mr. Cooper and then how
5 you get into the business with him?

6 A I met Mr. Cooper through Mr. Crockett. I flew out to
7 California and we did a marijuana sale. Cooper gave me and
8 Crockett a hundred pounds.

9 Q Now, by the way, did you just pass Mr. Crockett on the
10 way into the courtroom?

11 A I did.

12 Q Can you describe that transaction one more time. You
13 said you got 100 pounds from whom?

14 MS. McVAY: Your Honor, objection. Repetitive.

15 THE COURT: Overruled.

16 A From Cooper.

17 Q What was Mr. Crockett's role in that transaction?

18 A Rocket -- excuse me, I'm sorry. Crockett was the actual
19 logistic guy, you know, he put it together. I went in half
20 with him on the actual -- on the marijuana that we got from
21 Cooper and one of his Mexican friends.

22 Q What kind of marijuana was its?

23 A It was regular.

24 Q And over time how much total marijuana did you receive
25 from Mr. Cooper?

1 A Approximately 40 pounds per day with him and Crockett. I
2 don't know how much that would be approximately. We worked
3 from 2009.

4 Q Do you know what part of 2009?

5 A Yes. It was the beginning of 2009. January to June;
6 June, July, around that area.

7 Q And when you say 40 pounds a day, how many days of the
8 week?

9 A Five days a week.

10 Q And that went on for how many months?

11 A I would have to say from January to July -- well, from
12 January -- Crockett and Cooper, they took a break from one
13 another like in May I would to say, so from January until
14 probably around May.

15 Q What happened -- how was the marijuana transported?

16 A It was transported through FedEx, and it was also through
17 a crate, shipped.

18 Q So the 40 pounds that you were describing, was that the
19 FedEx?

20 A FedEx, yes.

21 Q How many crates did you receive from them?

22 A I received one crate.

23 Q When was that?

24 A That was in January.

25 Q What happened to the crate?

1 A The crate was confiscated.

2 Q By whom?

3 A By the government.

4 Q Did you know at the time that it was the government who
5 took it?

6 A No.

7 Q What happened after the crate was seized? What did the
8 organization start to do?

9 A It started to -- we went to FedEx. That's when we
10 started doing the FedEx shipment.

11 Q So after July -- I'm sorry, after May of 2009, who were
12 you doing marijuana business with?

13 A I was doing business with Crockett, and also Cooper
14 called me up after him and Crockett went their way, went their
15 separate ways.

16 Q And about how long -- at what time was that, what point
17 in time?

18 A I would say that probably was around June. June, July
19 roughly. Approximately.

20 Q In terms of paying for the marijuana, how did that work?

21 A We put the money in various bank accounts.

22 Q In whose bank accounts?

23 A Natalia Wade and Evelyn LaChapelle.

24 Q I'm sorry, Evelyn?

25 A LaChapelle.

1 Q Do you know those two people?

2 A I don't know them.

3 Q If they were standing in front of you, would you be able
4 to recognize them?

5 A No.

6 Q How do you remember those names?

7 A Because those are names that I consistently used on a
8 daily basis.

9 Q Do you recall if you had their names and/or account
10 numbers in your possession at your home?

11 A Yes.

12 Q Did you ever speak to them by phone?

13 A I did.

14 Q Can you talk about -- let's first ask about
15 Ms. LaChapelle. Did you ever speak with her by phone.

16 MR. LEE: Well, objection, Your Honor. If we have a
17 foundation, the person with whom he spoke.

18 THE COURT: Sustained as to foundation.

19 BY MR. KAUFMAN:

20 Q The person who was identified to you as Evelyn
21 LaChapelle, did you have conversations with somebody making
22 that assertion?

23 A I did.

24 Q Can you tell us about those conversations?

25 A Well, the conversation I had with her, she basically just

1 stated that, you know, she was making reference to the other
2 girl, that they were stupid not for not investing in the
3 marijuana trade.

4 Q When you say "the other girl," who was that in reference
5 to?

6 A Natalia.

7 Q And was that the only time you ever spoke to the person
8 according to Evelyn LaChapelle?

9 A No. I talked to her whenever there was an issue at the
10 bank.

11 Q What do you mean, "an issue at the bank"?

12 A The money might have not posted immediately or, you
13 know -- just everyday bank things. When they were headed to
14 the bank to actually pull the money out of their account to
15 let them know that it's there.

16 Q And did you have similar conversations with the person
17 purporting to be Natalia Wade?

18 A Yes, I did.

19 Q How often did you have these conversations with Ms. Wade?

20 A More. I would speak to her because I used -- she had
21 also -- also we had a business account on Natalia Fabulous
22 Jewelry, and we would use that a lot.

23 Q All right. Did you have any indication that she knew
24 what the money was from?

25 A Yes.

1 MR. GSELL: Objection, Your Honor. Speculation.

2 THE COURT: Overruled.

3 A She asked me to actually put in a good word for her at
4 one time.

5 Q With whom?

6 A With Crockett.

7 Q Why?

8 A To invest in the marijuana.

9 Q She specifically asked you to put in a good word with
10 Mr. Crockett for that purpose?

11 A Yes.

12 Q Now, did you personally deposit the payments into the
13 bank account or the bank accounts of Ms. Wade and
14 Ms. LaChapelle?

15 A I have on some occasions.

16 Q And about how many occasions do you believe that was?

17 A I would just have to estimate maybe, you know, 10, 15
18 times.

19 Q I'd like to show you what's been marked Government's
20 Exhibit 57A. 57 -- I'm sorry. Going back, 57A, 57B, 57C,
21 57D, 57E.

22 So 57A through E, do you recognize those images?

23 A Yes.

24 Q What are they?

25 A Me making deposits.

1 Q All right.

2 MR. KAUFMAN: Your Honor, we'd move to admit
3 Government's Exhibit 57A through 57E?

4 MR. LEE: No objection.

5 THE COURT: Let them be admitted.

6 (Government's Exhibit No. 57A thru 57E received.)

7 BY MR. KAUFMAN:

8 Q Scrolling through 57A, B, C, D, and e.

9 You said that sometimes you made the deposits. Who else
10 made the deposits?

11 A Tanya Williams, Lasonia White, and Heather Jones.

12 Q What was the arrangement you had with them?

13 A I would pay them 100 to 200 bucks a day to make the
14 deposits in their accounts.

15 Q Are you familiar with an individual whose nickname is Big
16 C?

17 A I am.

18 Q Do you know what Big C's real name is?

19 A Clyde.

20 Q Do you know his last name?

21 A I don't.

22 Q By the way, is that common not to know the last name of
23 individuals in this conspiracy?

24 A Yes, that is.

25 Q Why is that?

1 A Because we don't really know names. We go by more of
2 nicknames.

3 Q Why is that?

4 A For purposes I guess not to know their true identity.

5 Q Did you ever use a fake name?

6 A I went by SL if I went by anything, but most people knew
7 my by Shon.

8 Q Is that because you didn't want people to know your full
9 correct name?

10 A Yes.

11 Q So what was Big C's involvement in the conspiracy?

12 A Big C's involvement in the conspiracy was I met him
13 through Crockett and Cooper. And he called me up because he
14 had a Mexican contact that had some -- some kush, kush weed,
15 and I went to the Raleigh area to meet him. And it didn't pan
16 out because I couldn't sell it. It wasn't good. So, you
17 know, we came back to North Carolina, came back to North
18 Carolina and, you know, a few weeks later he called me, him
19 and Cooper, and they brought me 200 pounds of AZ.

20 Q What's AZ?

21 A It's a higher grade of marijuana.

22 Q How does the compare to, say, reggies?

23 A It's a better quality.

24 Q Well, how does the compare to kush?

25 A It's a less quality.

1 Q Have you ever been in the company of both Big C and
2 Mr. Cooper at the same time?

3 A Yes, I have.

4 Q Can you tell us about that?

5 A That's when they brought the 200 pounds on one occasion
6 and brought 250 on another occasion.

7 Q And so those were for drug deals?

8 A Yes.

9 Q Let me ask you did you ever see -- do you know what kind
10 of car Big C had?

11 A Yes. He had a Corvette.

12 Q When did you see it?

13 A I first saw it when Crockett and Cooper came up to North
14 Carolina when they were robbed by Kadija.

15 Q When you say "they were robbed by Kadija," what do you
16 mean by that?

17 A She just ran off with a crate.

18 MR. KAUFMAN: Nothing further, Your Honor.

19 (End of direct examination.)

20 - - - -

21 OCTOBER 17, 2013

22 MR. KAUFMAN: Your Honor, the United States calls
23 Sharon Kelsey-Brown.

24 **SHARON KELSEY-BROWN**

25 being duly sworn, was examined and testified as follows:

DIRECT EXAMINATION

BY MR. KAUFMAN:

Q Good morning.

A Good morning.

Q If you would please state your full name for the record and spell your last name.

A Yes. My shame is Sharon Janette Kelsey-Brown.

K-E-L-S-E-Y. Brown, B-R-O-W-N.

Q If you would spell Janette.

A J-A-N-E-T-T-E.

Q Thank you.

Ms. Kelsey-Brown, are you here having pled guilty to a drug trafficking conspiracy and money laundering conspiracy?

A Yes, sir.

Q How much marijuana and marijuana equivalent -- proceeds equivalent did you pled guilty to if you recall?

A Yes. I believe it was around about 11 tons.

Q Now, have you already been sentenced?

A Yes, sir, I have.

Q And so are you coming back here to testify from the Bureau of Prisons?

A Yes, sir, I am.

Q Do you have a projected release date from the prison?

A Yes, sir. My release date would be, um, April of 2015.

Q By the way, if you were to look at the counsel's table to

1 my right, do you actually recognize any of the people there?

2 A No, sir, I don't.

3 Q Okay. Let's turn to how you got involved in the
4 conspiracy you have been convicted of. Can you tell us how
5 that all started?

6 A Yes. It started with my daughter's father, Wayne Johnnie
7 Ken (ph), introduced to me over the phone to a gentleman. His
8 name was Marvin. And then, um, I started with him first with
9 selling the marijuana. And then, um, I was introduced from
10 Marvin to Daniel Crockett where I, um, accumulated that amount
11 of marijuana and selling and proceeds.

12 Q Now did you meet Mr. Crockett face to face?

13 A Not at first, no, sir.

14 Q But you did eventually?

15 A Yes, sir, I did.

16 Q Did you meet either in person or otherwise other people
17 working with Mr. Crockett?

18 A Some I did. Some I met just by telephone or by name.
19 Not meeting them, introduced to them. And then one other
20 gentleman I did meet prior to Mr. Crockett but his name is
21 Gerren Darty and that's who I met in person.

22 Q I'd like to throw out a few names, see if you recognize
23 them. Corvain Cooper.

24 A Yes, sir, I do.

25 Q Evelyn LaChapelle.

1 A Yes, sir, I do.

2 Q Natalia Wade.

3 A Yes, sir, I do.

4 Q Did you ever meet those people?

5 A No, I have never met those people in person.

6 Q So if they are standing in front of you would you be able
7 to recognize them?

8 A No, sir, I would not.

9 Q Let me ask you, if you could maybe chronologically tell
10 us how you became familiar with people purporting to have
11 those names?

12 A Well, with the gentleman, Corvain, over the telephone.
13 He was, um, Daniel Crockett's partner.

14 Q How do you know that they were partners?

15 A He would refer to him as his partners.

16 Q When you say "he referred to him as his partner," who was
17 the one that was telling you that?

18 A Daniel Crockett.

19 Q Did Mr. Cooper tell you that he was -- so the other side
20 of the partnership, did Mr. Cooper tell you that he was
21 Daniel's partner as well?

22 A Not that I can remember, but, um, I would do -- I would
23 have several conversations with Corvain on the telephone.

24 Q What about?

25 A About when the package would be delivered, when the

1 marijuana would get there, how much was coming, and, um, like
2 how much I was expected to send back.

3 Q When you say how much to send back, send what back, what
4 type of thing?

5 A The, um, the proceeds, the money that I would, um, get
6 from selling the marijuana.

7 Q And you're saying all those details were in conversations
8 with Corvain Cooper?

9 A Not all of them, sir, no, but some of them were.

10 Q All right. Can you tell us what specifically was being
11 sent to you?

12 A What was being sent to me was packaging. Sometimes, um,
13 anywhere from 20 to 120 pounds through, um, FedEx, in the
14 mail. And then sometimes it would be a crate shipment that
15 would come in.

16 Q When you talk about 20 to 120 pounds by FedEx, was that
17 in one individual FedEx package?

18 A No, sir, it wouldn't be in one individual package. It
19 would be sent in several different packages to several
20 different addresses.

21 Q What was the most you have received in any one particular
22 package?

23 A When you say "package," are you referring to the packages
24 or the crates?

25 Q The packages. We'll get to the crates in just a minute.

1 A Okay. I would say in one individual package about 60
2 pounds.

3 Q Let me ask you this: When did you first encounter the
4 person with the name "Corvain Cooper" by phone? When was that
5 first conversation?

6 A I can't recall the date. I can't recall that, sir.

7 Q Do you remember the month or even the year?

8 A Um, I believe it was in 2009.

9 Q With regard to the proceeds you were saying, how did the
10 proceeds get moved?

11 A Either myself or I would instruct my husband or I would
12 pay other individuals to deposit, um, anywhere -- anything
13 lower than, less than 10,000.

14 Q What's your husband's name?

15 A My husband's name is Robert Jonathan Brown.

16 Q Who are some of the people that you paid to make the
17 deposits on your behalf?

18 A Um, numerous people.

19 Q Maybe I should ask it this way: Approximately how many
20 people did you pay to do that?

21 A If I had to say less or greater, I would say greater than
22 ten; around about ten or greater.

23 Q I have what's been marked as Government's 70A.

24 MR. KAUFMAN: Ms. Hankins, it's a two-page document.
25 Is it preferable to do two separate sub-exhibits or can I do

1 two pages, one using the doc cam?

2 THE CLERK: You can do two separate exhibits or if
3 you want to show it at this time, you can provide it to me
4 later.

5 MR. KAUFMAN: Thank you.

6 BY MR. KAUFMAN:

7 Q I'd like to show you what's been marked 70A for
8 identification. Do you recognize the individual in this
9 image?

10 A Yes, sir. That would be myself.

11 Q And do you know what you were doing in that image?

12 A It looks as though I'm in a bank depositing money.

13 Q And on page 2, do you see any signatures on this document
14 that you recognize?

15 A Yes, sir, I do.

16 Q And can you describe what signature that is and whose it
17 is?

18 A That would be my signature, sir.

19 MR. KAUFMAN: Your Honor, at this time we'd move to
20 admit 70A and publish it to the jury.

21 MR. LEE: No objection.

22 THE COURT: Let it be admitted.

23 (Government's Exhibit No. 70A received.)

24 BY MR. KAUFMAN:

25 Q So page 1 of 70A. Ms. Kelsey-Brown, this is you at the

1 bank I believe you testified?

2 A Yes, sir, it is.

3 Q And then on this deposit slip that's your signature where
4 I'm pointing here on the signature line?

5 A Yes. Absolutely.

6 Q The name of the holder of the account is what?

7 A Evelyn LaChapelle.

8 Q Now, is this name familiar to you?

9 A Yes, in fact, it is, sir.

10 Q When did you first hear that name?

11 A Um, I would say around about 2009.

12 Q And how did it become familiar to you?

13 A I was instructed by Daniel Crockett to deposit whatever
14 money that was, um, gained from the marijuana, to deposit it
15 back into this particular account.

16 Q And was it only Mr. Crockett who gave you that
17 instruction over time?

18 A Yes, it was, um, Mr. Corvain who at times would instruct
19 me what account to put it in.

20 Q Do you recall any other account holder's names into whose
21 bank accounts you made deposits?

22 A Yes, I do. Goldie Crockett's. Natasha Wade.

23 Q Natasha Wade?

24 A Yes.

25 Q Do you recognize any -- were there any business account

1 names that you deposited into? For example, a jewelry
2 account? Does that sound familiar?

3 A No.

4 Q Does the name Francine Williams sound familiar?

5 A Yes.

6 Q Did you make deposits into an account belonging in that
7 name?

8 A Yes. Either myself or I paid other people to do it.

9 Q Do you have any knowledge, either from personally
10 observing it happen or from speaking to folks who are doing
11 it, any knowledge about the packaging and shipping of the
12 marijuana?

13 A Yes. I have knowledge of how it's packaged and shipped.

14 Q Okay. And who did you talk to or see to gain that
15 knowledge?

16 A Well, either, um, Mr. Crockett or Corvain would, you
17 know, phone me and let me know when they were packaging, what
18 time it would be delivered. Like if they were at the U-Haul
19 place getting the -- Saran Wrap the package, or they were
20 running around trying to get the actual, um, little plastic
21 containers that it would be packaged in -- because we were
22 basically on a time line. And so if it was running late, they
23 would be like that, okay, I'm doing this right now. When I
24 say "they," either Crockett or Mr. Corvain.

25 And then they would, um, tell me where they were taking

1 it; where it would be delivered at; what time it would get
2 there; what time I needed to be out there, myself or someone
3 else to pick it up. And, um, how, um, when I would get it, I
4 knew how they, you know, would recognize what it was.

5 Q I'd like to show you what's already been admitted as
6 Government's 2B. If it's hard to see it's because of the
7 angle of the terminal of the screen.

8 Are you able to see that image?

9 A Yes, sir, I do.

10 Q Does that look familiar to you?

11 A Yes, actually it does.

12 Q How so?

13 A It looks like one of the bigger packages, the crates that
14 were sent to me from Daniel and Corvain.

15 Q As with regard to the FedEx packages, were both Daniel
16 and Mr. Cooper involved with the crates as well?

17 A Yes.

18 Q Approximately how many different crates did you receive?

19 A Um, I really don't feel comfortable with giving a number
20 because I can't remember.

21 Q Can you give a low end, like was it more than a couple?

22 A I'm going to say about a dozen.

23 Q Okay. Do you know if there were other crates being
24 shipped here from the same organization that were being
25 received by other people other than yourself?

1 A Yes.

2 Q How do you know that?

3 A Um, when you're in this business it's just -- you know,
4 people talk, and I had a couple of, um, other people on my
5 indictment who we, um, had dealings with, some of the same
6 people.

7 Q Do you remember any crates being intercepted by one
8 person or another or one organization or another?

9 A Yes, I do.

10 Q Can you tell us about the first one?

11 A Yes. The first one, um, was, um, my husband and Daniel
12 had, um, went to go and picked the crate up, and, um -- um,
13 Daniel decided for some reason -- normally he doesn't come
14 into Charlotte, but this one particular time he came to
15 Charlotte, because normally my husband picks the crates up.

16 And, um, Mr. Crockett got the crate and proceeded to take
17 it to my house. And, um, he called me several times and told
18 me that it was an emergency, that I needed to come home. And
19 I came home and he said that he felt as though that the police
20 was following him, and he had to jump out of the truck and
21 leave it. And so he left the truck at the bottom, um, of
22 where I resided at that time, the bottom in a parking lot,
23 apartments and, um --

24 Q Ma'am, so when you say he brought the marijuana to your
25 house, you mean into the house or to this area you're

1 describing near your house?

2 A No, he didn't bring it into the house. He had not even
3 gotten it out of the truck yet. He just took it to -- he
4 jumped out of the truck, like parked it, and left it in this
5 parking lot in the area where I resided.

6 Q Okay. What happened to it?

7 A Strangely we waited until like dark to go near the truck,
8 and then I paid an addict, a junky, to get in the truck and to
9 move it. And when he got in and drove it, I was behind the
10 truck and I saw the back gate rise up, and I saw the crates
11 were like moving around and I knew something was wrong because
12 normally when we get a crate it's heavy and it would be in the
13 same position. And so I told him to pull over. And when he
14 did, we looked inside the crates and everything was gone.

15 Q All right. Was there -- were there any other crates
16 after that that were intercepted?

17 A Yes, sir. It was another crate that was intercepted and
18 that was intercepted by myself.

19 Q Can you tell us about that?

20 A It kind of got towards the end of our relationship, our
21 relationship with Daniel and Corvain. And, um, it was always
22 an issue about the money, or I felt like they were cheating
23 me. They felt like I was cheating them. So I decided to take
24 it upon myself to take this last crate that I figured it would
25 be my last one with them, and I took it and I told them that

1 it got intercepted by the police.

2 Q What was their response to that?

3 A Oh.

4 Q Did you, for example, after you told them about that, did
5 you ever have another conversation with Mr. Cooper?

6 A Yes.

7 Q Tell us about that, please?

8 A He basically was asking me like -- pretty much
9 questioning me like what happened? How did the police get
10 this amount, large amount of marijuana and that I did not have
11 any proof that I was arrested or anything like that.

12 And then him and Daniel I believe came to Charlotte
13 looking for me. But, um, I would avoid them. I would avoid
14 their phone calls. And I moved.

15 Q When you took that crate, didn't you think that would be
16 dangerous?

17 A Um, yes, I did.

18 Q Why did you do it?

19 A I honestly can't say. I just felt like they owed me, you
20 know.

21 MR. KAUFMAN: Nothing further, Your Honor.

22 (End of direct examination.)

23 - - - -

24 **EVELYN LACHAPELLE**

25 being duly sworn, was examined and testified as follows:

DIRECT EXAMINATION

1
2 BY MR. LEE:

3 Q Good morning, Ms. LaChapelle.

4 A Good morning.

5 Q Would you please introduce yourself to the jury? State
6 your name and where you live.

7 A My name is Evelyn LaChapelle. I currently reside in San
8 Lorenzo, California.

9 Q Ms. LaChapelle, do you have a different name now other
10 than LaChapelle?

11 A No. That's always been my name.

12 Q Do you also go by the name of Sutton? Are you married to
13 a Mr. Sutton?

14 A I did get married in 2009.

15 Q What is his name, please?

16 A Matthew Sutton.

17 Q Do you have a child by Mr. Sutton?

18 A I do. Vanice (ph) LaChapelle Sutton.

19 Q Thank you.

20 Now, back in 2003 how old were you, Ms. LaChapelle?

21 A I had just turned 18 in the year 2003.

22 Q Were you employed during the year 2003?

23 A I was not. Maybe babysitting.

24 Q And how did you support yourself? Did you have a source
25 of funds?

1 A Yes. My mother and my father and my grandfather.

2 Q Did you also have any monies provided to you through a
3 family trust, for instance?

4 A Certainly. As soon as I enrolled in college that year.

5 Q In 2003?

6 A In 2003 in the fall semester.

7 Q Now, the government showed you -- and I won't bother to
8 call the exhibit up -- showed you a tax return, or rather
9 Certification for Lack of a Tax Return for 2003. Did you or
10 can you recall having filed a tax return for 2003?

11 A No. I was actually still a dependent of my mother up
12 until I gave birth to my own child.

13 Q When did you give birth?

14 A October 2009.

15 Q Thank you.

16 And you were also shown a series of tax returns, 2004 up
17 to I think 2010, or Lack of Tax Returns. Is that correct?

18 A Yes.

19 Q Do you recall having seen a Lack of Certification for Tax
20 Return for 2006?

21 A I did.

22 Q And did you file a tax return for 2006?

23 A I did not.

24 Q And why was that?

25 A Well, one of the stipulations of my trust fund was to

1 focus on school, so I rarely worked unless I was presented
2 with a good opportunity, you know, odd jobs, catering,
3 serving. So in that year I did not. I was mainly focused --
4 it was my last year of my associate's degree.

5 Q Have you finished your college degree?

6 A I completed my bachelor's degree -- I walked in May 2011,
7 I actually completed my courses that December 2010 with a
8 business administration degree; and entrepreneurship, Loyola
9 Marymount Catholic University.

10 Q Now, in 2008 were you acquainted with a Daniel Crockett?

11 A In 2008. I met Daniel later on in the year.

12 Q All right. And did you become acquainted with someone
13 known to you as Corvain Cooper?

14 A I did.

15 Q Do you recall roughly when it was you met Corvain Cooper?

16 A I met Corvain, it was maybe October. It was late in the
17 year.

18 Q Of what year, please, ma'am?

19 A 2008. I recall this because the sun was setting early, I
20 was at a grocery store.

21 Q Which grocery store was that?

22 A It was a parking lot of a Ralph's Grocery Store in an
23 affluent area of Los Angeles.

24 Q Did you live in the area of Ralph's Grocery Store?

25 A I did.

1 Q Can you describe how it was that you met Mr. Cooper in
2 the parking lot at Ralph's Grocery Store?

3 A Certainly. I had parked fairly far from the front door
4 of the grocery store, and instead of leaving my cart like most
5 people do, you know, by your car, I walked it all the way back
6 to the front door. So on my way back to the car, I was
7 stopped by Corvain and he just said that he was impressed.
8 You know, "How are you doing? I'm impressed. I watched you
9 walk all the way across the parking lot with your grocery
10 cart."

11 Q Do you recognize someone in court today whom you met and
12 whom you know as Corvain Cooper?

13 A I do.

14 Q Would you please point out to the Court the person you
15 know as Corvain Cooper?

16 A The gentleman in the blue shirt.

17 MR. LEE: I ask the record reflect she has
18 identified Corvain Cooper.

19 THE COURT: It will.

20 BY MR. LEE:

21 Q Now, how did this chance encounter go with Mr. Cooper?
22 What else was said in the parking lot during this exchange of
23 pleasantries?

24 A We spoke for a few minutes. I was having a pretty bad
25 day which left me open to have a longer than normal

1 conversation than I would with a stranger. He complimented
2 me, and we just exchanged numbers just like you would when a
3 guy is, you know, approaching you. You're cute. Can I have
4 your number?

5 Q How old were you at the time, Ms. LaChapelle?

6 A Twenty-two.

7 Q You were still in college?

8 A I was still in college.

9 Q What kind of car were you driving? What did you drive to
10 Ralph's Store that day?

11 A I still drive a Toyota Corolla.

12 Q Now, after you and Mr. Cooper exchanged telephone
13 numbers, when did you next see or speak with or communicate
14 with Mr. Cooper, and under what circumstances?

15 A We had a few casual flirtatious text messages because
16 that's what we do at that age is text back and forth. And I
17 believe our first encounter was a lunch. He came to my job
18 and we had lunch at a restaurant called Ketchup's.

19 Q Ketchup?

20 A Ketchup. It's in Beverly Hills.

21 Q Where were you working when he came to your place of
22 work?

23 A I was working at CitiBank.

24 Q How long have you been working as Citibank?

25 A Less than a year. I think I started February of 2008.

1 Q And how old would you have been when you started working
2 with Citibank?

3 A I started in February. I was 21.

4 Q And what were your duties or for what position were you
5 hired at Citibank?

6 A As a customer service representative and a teller.

7 Q All right. And as customer service representative and
8 bank teller, did the bank send you off to any banking classes
9 to learn how to be a teller or a CSR person?

10 A Normally they would conduct outside training. I was in
11 school and I was only working part-time, so they allowed me to
12 do my training there at the branch on the computer while
13 working with the customers, so there was no class assigned.

14 Q Can you describe how often or how intensive or how long
15 these training sessions lasted?

16 A The trainings were not intensive at all. I don't know if
17 anyone is familiar with Internet training, but you kind of
18 click through and click as the time goes by. You're given an
19 hour to complete it and you kind of like click while your
20 helping the next customer.

21 Q So you're working at Citibank. Mr. Cooper comes by your
22 bank. Did he come by unannounced or were you expecting him
23 that day?

24 A I was expecting him for lunch.

25 Q You all went to the lunch at Ketchups you said?

1 A Uh-huh.

2 Q What was discussed, if you recall, during your luncheon
3 with Mr. Cooper?

4 A Just general get to know you information. Where are you
5 from. If you have any kids.

6 I was currently a licensed real estate agent. It wasn't
7 going well from me. I'm not from Los Angeles so getting
8 clients wasn't that easy to come by. I let him know that I
9 was pursuing that as a career. I was in school. And he let
10 me know his different real estate ventures. That he had a
11 daughter. I'm not sure how old she was. It was just
12 get-to-know-you first date. It was a real first date.

13 Q Now, after that, how did your relationship with
14 Mr. Cooper unfold?

15 A We kind of kept that pace. There was lots of more lunch
16 dates, a few evening dates. I was in school and working so my
17 time was a little limited. But we had several dates. We went
18 to -- there was a Persian restaurant by my job. There was an
19 Italian restaurant. He often brought me food on my lunch.
20 Flowers almost every day. Sunflowers.

21 Q Was this during the time at which you were pregnant?

22 A I had not become pregnant yet.

23 Q When did you become pregnant?

24 A In January of '09.

25 Q Did Mr. Cooper continue to engage you in social niceties

1 after you became pregnant?

2 A He did.

3 Q But he's not the father, is he?

4 A No, he's not.

5 Q Now, I'm not trying to be graphic about this, but did you
6 and Mr. Cooper ever consummate a relationship? Did you all
7 have intimate relationships?

8 A We did not. That were two opportunities that presented
9 itself where we could have. I believe the first opportunity I
10 had was in finals, so that was an excuse, I've got to go. I
11 have to study. And I believe we got a room at the Beverly
12 Hills something, Hilton or something, but I left really
13 abruptly; a little uncomfortable.

14 And then the second time I remember he had gotten into a
15 pretty heated argument with his -- the mother of his child
16 over his church tithes that she had taken. And he had me come
17 pick him up. And I then went -- we went to the Culver City
18 Courtyard, and there was another opportunity for it to rise,
19 but I removed myself from the situation.

20 Q Did Mr. Cooper treat you -- was he always a gentleman
21 when he was with you?

22 A Absolutely.

23 Q Did he ever -- how did he dress? Did he dress as someone
24 who was successful or someone who was disheveled, on his last
25 dime? How did he come across?

1 A He was definitely well dressed, well groomed; not too
2 flashy. I say not too flashy in the sense that it's not
3 someone that you see in the -- it's not a rapper. Not
4 something you see in music video. He was always well groomed.
5 Like I said, I met him in the affluent area, so it was not a
6 surprise for me that he wouldn't be successful in whatever he
7 did. And I met him driving a white Porche.

8 Q He was driving a white Porche?

9 A Yes, he was.

10 Q Did you ever see him drive any other cars?

11 A I did not.

12 Q Did he ever discuss with you this relationship he had
13 with his wife or his girlfriend? Did he say which the two it
14 was?

15 A It was girlfriend. We discussed it often. I was in a --
16 for lack of better words, a bad relationship with a guy who
17 cheated often. And I know that he was in an -- ending a
18 relationship with the mother of his second child. And so on
19 many occasions we were up on the phone for hours or parked in
20 a car for hours just discussing how terrible these people were
21 to us.

22 Q Did Mr. Cooper ever present himself as having a line or
23 lines of business or sources of income to you?

24 A He did.

25 Q And what were those, please?

1 A I think our first conversation started off about his real
2 estate ventures. Because, again, I introduced myself as a
3 real estate agent trying to get in the business. I do that
4 often when I meet everyone hoping to find a client or
5 connection to some source of real estate business.

6 So he mentioned that he had real estate ventures. I know
7 for sure that he had a property in Los Angeles and another one
8 with his first wife. There was also the clothing store that I
9 witnessed because it was not too far from my house.

10 He at first did not mention it to me. I was driving down
11 the street and seen the pictures. He had his daughter's faces
12 painted on the side of the wall, and I recognized their
13 pictures. And I think those were the two businesses; real
14 estate and his clothing. And I know that his second, the
15 mother of his second child also was into selling clothes.

16 Q Do you recall Mr. Kaufman having produced an exhibit
17 yesterday, your family trust?

18 A Yes.

19 Q And do you recall him showing some language in there that
20 you were having some credit or money problems?

21 A I do.

22 Q Did you ever discuss those problems later with
23 Mr. Cooper?

24 A Me and Cooper were pretty close, so I don't think there
25 was any aspect of my life that I had not discussed with him.

1 Q Did Mr. Cooper offer you any ideas on how you could try
2 to position yourself credited-wise or business-wise?

3 A Yes. Mr. Cooper was a businessman, so he often had
4 ideas. One idea in particular was his condo that he had on
5 Eucalyptus, I believe, not too far from me.

6 The market had kind of crashed around 2009, and he needed
7 to short sell it. And he offered that as an opportunity for
8 me to short sell the condo that he had. I believe his loan
9 had gone upside down on it, and that was one of the
10 opportunities that he presented to me.

11 Q Now, when you were working at CitiBank, did you have an
12 account, a personal account at CitiBank?

13 A I did.

14 Q Did Mr. Cooper ever ask you to open up accounts either at
15 CitiBank or other banks?

16 A Not at CitiBank. Later on.

17 Q All right. Later on. When would that have been?

18 A Later on, maybe January or February of '09 in the next
19 year, he, um -- the original question was not to open a bank
20 account. The original question was can I put some money into
21 your account because his girlfriend was very flashy or was
22 taking over everything he did. She got a new Audi. Like I
23 said earlier, they had an argument over his tithing.

24 Q His what?

25 A His church tithes. He said he had a mirror where every

1 day he put his ten percent on the side of the mirror. And one
2 day she came in and took it. And I do not recall what she
3 bought. So he was over her spending all of his earnings. He
4 was like basically can I put some money into your account.

5 Q Did you see him make deposits into your account himself?

6 A No.

7 Q How did this account activity unfold, please? I mean you
8 opened an account at Mr. Cooper's request, right?

9 A I opened a separate account because I had already had
10 accounts at Bank of America. I had been a customer at Bank of
11 America since my first job when I was 17, and so to not
12 co-mingle my funds with his funds, for there not to ever be
13 any confusion, for my trust fund, to not ever question me, I
14 decided that I would use another account for Mr. Cooper.

15 Q All right. Now, when you opened this other account for
16 Mr. Cooper, whose name went on the account?

17 A Mine did.

18 Q Did you have to provide your own address when you started
19 this account?

20 A I opened it online, and from what I recall, if you
21 already have bank accounts, it's really simple to attach
22 another one. I attached it to the same card of the accounts
23 that I already had.

24 Q After you opened this account with Mr. Cooper with Bank
25 of America, when, if you know, when did money start to go into

1 the account?

2 A Maybe two weeks later.

3 Q And can you tell us whether you knew money was coming in
4 or whether Mr. Cooper just asked you to take money out?

5 A I would normally just get a phone call or a text from
6 Corvain saying, you know, I put some money in your account or
7 some of my friends or my associates -- never friends -- put
8 some money in your account. Can you withdraw it.

9 Q How old were you at the time?

10 A Twenty-three.

11 Q All right. Now, you saw the government summary exhibits
12 showing the money in and money out yesterday. Correct?

13 A I did.

14 Q Did you really monitor the account yourself back then to
15 see what was going in and what was going on out?

16 A To be honest with you, I hadn't. I did -- and I still
17 do -- chose to receive all my statements electronically so
18 it's in my spam email. And even when all of this unfolded,
19 when this case came knocking at my door, I could not have ever
20 imagined that it was the amount that it was.

21 Q Now, did Mr. Cooper pay you anything for use of your
22 account?

23 A I was not given a fee. I was not told that this, to take
24 that. It was more of a leave this in there. We'll go have
25 lunch later. Leave that in there. We'll go do this later.

1 Q Did you occasionally use the account for personal items
2 yourself?

3 A Yeah. Because as I mentioned before, my accounts were
4 still linked, and so when I swiped the card for the nail shop
5 or for the gas, those were checking accounts that I had had
6 since I was 17.

7 Q Now, at some point your relationship with Mr. Cooper
8 began to diminish and drop off, did it not?

9 A Yes.

10 Q Do you recall roughly when that was?

11 A It was towards the end of my pregnancy. Corvain had been
12 my support system throughout the entire pregnancy. Doctor's
13 appointments. Lunches. The flowers. I didn't have a
14 supportive father of my child.

15 But towards the end I wanted to have a family. I wanted
16 my daughter to have her father. I didn't want to start my
17 daughter's life off with another man. And so toward the end
18 of my pregnancy, we had a conversation, and he was also having
19 a child; that I would kind of break ties with him because it
20 was causing turmoil between the father of my child and myself.

21 Q During the time that you were involved with Mr. Cooper,
22 did you ever travel to any states other than California with
23 Mr. Cooper?

24 A We never traveled outside of Los Angeles.

25 Q Did you ever travel to any states without Mr. Cooper for

1 any other reason during that year?

2 A For vacation.

3 Q And where would that be?

4 A Every year my mom, my sister and my godmother and I go to
5 Vegas for our birthdays. Me and my sister's birthday are a
6 week apart.

7 Q Did you ever come to North Carolina during 2009?

8 A Never.

9 Q Did you ever go to South Carolina or Georgia during 2009?

10 A Never.

11 Q Now, during your relationship of sorts with Mr. Cooper,
12 did you ever encounter or meet a Shondu Lynch?

13 A Never. Never in my life.

14 Q Did you ever encounter or meet a Sharon Kelsey-Brown?

15 A No, sir.

16 Q Did you ever telephonically communicate with anyone by
17 the name known to you as Sharon Kelsey-Brown or Shondu Lynch?

18 A No, sir. Never.

19 Q Did you ever communicate with or know a Darrick or D.
20 Johnson?

21 A No, sir.

22 Q Were you acquainted a Daniel Crockett?

23 A I was acquainted with him through Corvain. From time to
24 time they would be together. It was my understanding they
25 were really good friends; went to high school together.

1 Q How often would you see Daniel Crockett?

2 A If I'm seeing Corvain four times a week, I'd probably see
3 Daniel with him once out of the four times.

4 Q And say during the year 2009, just roughly, can you
5 describe your interactions with Daniel Crockett for the jury?

6 A Certainly. My first encounter with Daniel was Corvain
7 brought me chicken wings to my job from a restaurant across
8 the street and Daniel was with me. I believe Corvain had used
9 Daniel's phone to call me. He had left his at home. He
10 called to let me know he was outside so I could come get the
11 chicken. Went back to work, had my lunch. Later on Daniel
12 sent me -- because now he has my number, sent me a text, a
13 very inappropriate text message -- it was more so along the
14 lines of you -- you look so good I could eat you up, or
15 something of that nature.

16 Q Did Daniel -- other than that text message, did Daniel
17 Crockett have any further direct communications with you
18 through text or flirtiness or anything like that?

19 A He was always flirting. He was a rambunctious type of
20 guy. Always flirty. Always loud. The opposite of Corvain.
21 We did not encounter each other often outside of Corvain.

22 There was one other situation for my birthday, actually
23 for my trip to Vegas, where Corvain couldn't make it to meet
24 me -- I don't know where we were meeting -- but Daniel brought
25 my gift. Corvain had got me a gift from BB, and Daniel

1 brought it to me. And that was from Corvain. And I think
2 that may have been one of the only other times that we met.

3 Q Did you ever go to a restaurant in Malibu with Daniel
4 Crockett?

5 A Certainly. It was Valentine's Day.

6 Q Can you tell us about that encounter with Daniel
7 Crockett?

8 A It was an unexpected surprise. I was at work and Corvain
9 showed and they had rented a Cadillac Escalade. I was
10 unprepared because I looked a mess that day. Daniel was there
11 with a girl other than his wife.

12 And we all rode out to Malibu, because it was my first
13 time ever in Malibu. Ate at a fancy restaurant that I don't
14 recall the name of. Rode home. I think it's about an hour.
15 Rode in the car. Witnessed Daniel and the other girl become a
16 little inappropriate. Me and Corvain sat in the back. He
17 rubbed my feet and I went home.

18 Q Were you acquainted with Mr. Crockett's wife?

19 A My first encounter with Goldie was because of that text
20 message that Daniel sent me, and she sent me a replying text
21 message, you know, Who are you? What are you doing with my
22 husband? Sort of like that. And I assured her that, no, I'm
23 not involved with your husband. I think my direct response
24 was, Girl, I have my own problems with my own cheating man at
25 home.

1 Q Now, the money that went into the account at Bank of
2 America, the one that Mr. Cooper asked that you open for him,
3 the bulk of the money you testified you withdrew and gave to
4 Mr. Cooper. Correct?

5 A Certainly.

6 Q Did you consider that money to be your money?

7 A No.

8 Q Did you consider reporting that money as income of yours
9 on your taxes?

10 A I've always filed my income tax with a professional. Had
11 they asked me for bank statements, had they asked about any
12 additional funds, I would have certainly reported it.

13 Q But you didn't volunteer that to your accountant, did
14 you?

15 A No.

16 Q Why is that?

17 A Honestly, at 22, I don't know what they want other than
18 my W-2s. That's what I gave them.

19 Q Would it fair to say that you didn't know what the
20 income, the Tax Code definition of "income" was?

21 A That would be correct.

22 Q Okay. During the time say from 2003 forward, at what
23 point did you move out of your family's home and take up our
24 own place of residence?

25 A I moved out at 18.

1 Q 2003?

2 A 2003. Shortly after high school graduation. I think
3 three months after high school graduation.

4 Q Where did you move to?

5 A I moved to Los Angeles.

6 Q For those of us who are in the familiar with
7 California --

8 A I moved about five hours, maybe about a six-hour drive
9 away from home from the bay area to Los Angeles.

10 Q Where in Los Angeles did you live? Did you have an
11 apartment?

12 A I shared an apartment with my roommate who went to U.S.C.

13 Q And had you met your roommate before renting the
14 apartment with her?

15 A I had not. We had mutual cousins.

16 Q Who were those mutual cousins?

17 A My cousin, Page LaChapelle, who is an infant
18 neurosurgeon. I had a friend, Isu Johnson (ph), who was an
19 attorney. And so they both had little cousins going to
20 college who needed a roommate.

21 Q When did you move away from that apartment?

22 A I moved away I believe in 2007. I graduated with my
23 associates degree in 2007. By the time I graduated I had
24 already moved away from that apartment with my roommate.

25 Q Where did you move? Where did you move to your own

1 apartment at?

2 A 852 West Beach.

3 Q That was the residence at what you now realize Agent
4 MacDonald came to your door?

5 A I do recall.

6 Q All right. Now, when you were living at the Beach Avenue
7 address, the one to which Agent MacDonald went, did you have a
8 roommate there?

9 A I had a few people who had come to stay with me over the
10 time, but more specifically Natalia came to live with me.

11 Q Natalia?

12 A Natalia Wade.

13 Q She is present in court today?

14 A She is.

15 Q Can you identify her?

16 A Of course. She's the lady in the white shirt and the
17 black sweater.

18 MR. LEE: We'd like for the record to reflect that
19 she had identified Natalia Wade.

20 THE COURT: It will.

21 BY MR. LEE:

22 Q Describe for us how Ms. Wade came to room with you and
23 what your relationship was with her?

24 A My relationship with Natalia Wade started when I was six,
25 so I think that would have been 1991. My mother and I moved

1 to -- and my sister moved to an apartment in San Leandro where
2 Ms. Wade had already lived with her mother. We were
3 neighbors. We continued to be neighbors. Our mothers
4 continued to be neighbors well into our adult years.

5 Q So she was someone close to you?

6 A Certainly.

7 Q During the time -- how long did Ms. Wade and you live
8 together?

9 A For maybe a year or 13, 14 months.

10 Q And where was that?

11 A At 853 West Beach.

12 Q Did you and she have your own telephone numbers or did
13 you share a telephone number?

14 A I had my cell phone and then there was a land line that I
15 kept.

16 Q When you say you kept, do you still have that land line?

17 A I do not. I moved since then.

18 Q When did you give it up roughly, do you know?

19 A I moved in 2009.

20 Q Now, to be clear, did you ever communicate with anyone
21 who testified for the government, or any names that those
22 witnesses may have thrown out, did you ever communicate with
23 any of those people for drugs or any other reason?

24 A I've never communicated with any one of those people in
25 this courtroom that testified, that wrote letters about any

1 drugs or marijuana.

2 MR. LEE: If I could have one moment, please, Your
3 Honor?

4 THE COURT: You may.

5 (Pause)

6 BY MR. LEE:

7 Q Can you generally describe your financial position during
8 2009 and 2010. Were you flush with cash, living high on the
9 hog?

10 A I don't know what "high on the hog" means, but I was
11 okay. My family has pretty much always taken care of me.
12 I've never not wanted for much, and when I did work, it was
13 really to gain a good resume or to have extra cash. It was
14 not because I needed it.

15 Q Did you have your own, like Mr. Crockett, your own
16 \$2 million home?

17 A I did not. I had an apartment that I rented for 950 a
18 month.

19 Q Did that include utilities or not include utilities?

20 A That included my water and trash.

21 Q Now, this bank account that Mr. Cooper had you open up
22 for him, did you ever give that account up?

23 A Did I ever give up the account number?

24 Q Did you ever give the account up or quit --

25 A Did I ever close it? Certainly.

1 Q Thank you.

2 A As soon as I decided that I would part ways with
3 Mr. Cooper, as I said earlier because of the decision to raise
4 my child properly, I closed the accounts.

5 Q Did you ever maintain your other account at Bank of
6 America?

7 A I still to this day use that debt card with that PIN
8 number.

9 Q Is that the one you share with Mr. Sutton now?

10 A No. I share accounts with Sutton at CitiBank.

11 Q Where?

12 A At CitiBank.

13 Q Now, did Mr. Cooper ever tell you or instruct you or
14 caution you or signal or otherwise communicate to you the
15 reason why he was asking for withdrawal amounts from that
16 account in the amounts that you took it out for?

17 A No, I only withdraw what was in there. There was never
18 more than 10,000 for me to withdraw. So if he called me and
19 told me to withdraw eight, that was because there was 8,000 in
20 the account. Had there been 12, 13 or 14, that's what I would
21 have withdrew.

22 Q Did you ever know of Mr. Cooper to have interests in
23 women other than yourself and his wife during the time that
24 you knew Mr. Cooper?

25 A I only knew of his then girlfriend, the mother of his

1 second child. Me and Cooper -- I'm sorry, Corvain. Me and
2 Corvain interacted often but I was a busy girl at school,
3 work, home life that our nightlife rarely interacted with each
4 other. So what he did he did outside of me would have been
5 outside my knowledge.

6 Q He tried to tithe to his church. Is that correct?

7 A He did.

8 Q Did he go to church with you?

9 A He never attended church regularly but I know he attended
10 West Angeles Church. I'm into smaller churches.

11 Q Did you all ever discuss that together?

12 A Often.

13 MR. LEE: No further questions.

14 (End of direct examination.)

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